



# Anti-Corruption Policy



APRIL 2025

## I. COMMITMENT OF THE GOVERNING BODY

The management body of PRAXIA ENERGY S.L. declares its firm commitment to regulatory compliance, ethical behavior and the prevention of any illegal or criminal conduct.

As a result of the aforementioned commitment, the management body has approved this Anti-Corruption Policy as a specific control measure aimed at promoting compliance within the company and the prevention of crimes of a fundamentally economic nature likely to cause the criminal liability of PRAXIA ENERGY, paying special attention to the prevention of these crimes, fraud, bribery, corruption in business, bribery, crimes against the Public Treasury and Social Security and money laundering.

This policy is approved with the virtuality of being integrated into the internal processes of PRAXIA ENERGY and being mandatory knowledge and compliance for all its members.

## II. PRINCIPLES OF ACTION

The commitment and measures adopted by PRAXIA ENERGY in the fight against corruption are framed within the Criminal Compliance Management System as specific measures for the detection and prevention of crimes of an eminently economic nature, expressly prohibiting all its employees and business partners from resorting to unethical practices that may be understood as inducing a lack of impartiality, transparency and rectitude in decision making by persons belonging to the public or private sector, assuming a firm commitment not only to regulatory compliance but

also to the high standards established in the company's corporate governance rules.

### III. INTEGRITY AND RESPECT FOR LEGALITY IN PAYMENTS AND COLLECTIONS

In the performance of their duties and in their relations with PRAXIA ENERGY's business partners, all its members are responsible for ensuring that their decisions and actions are carried out in full compliance with the laws and internal rules of the company.

In this sense, the internal rules regulating the system of payments and collections shall be observed, in order to maintain an adequate control of the money that enters and leaves the company and that the movements operated have the necessary authorization and justification, being expressly prohibited payments or collections that do not respect this policy and the measures of internal controls provided by PRAXIA ENERGY and are not duly authorized or justified in this regard:

- All payments and receipts must be duly justified and in accordance with the bids and contracts signed.
- All payments must be duly authorized and made by the means expressly established by the company, being expressly prohibited all payments or collections made in cash that exceed the legally established limit (1000 euros).

### IV. GIFTS, HOSPITALITY AND EXPENSES.

It is expressly forbidden to give and receive gifts, presents and attentions that, given the conditions under which they are given, their amount or economic value or other circumstances, may be suspected of being given with the intention of influencing the will of the person receiving them. In the event that this type of gifts and hospitality are offered to members of the company, they must be politely refused and brought to the attention of the Compliance Body. In the event that, due to the circumstances surrounding the gift, it is not possible to refuse it, it shall be made available to the Compliance Body with an explanation of the corresponding circumstances so that the gift may be used as decided by the Governing Body.

Gifts in cash, regardless of their amount, are expressly prohibited.

However, gifts may be accepted and offered which, in no case exceeding the amount of 100 euros, are in accordance with the usual uses and customs of mere courtesy, are not made with the intention of influencing decision-making or obtaining undue favors and are made or received in a public and transparent manner with identification of the recipient and at the registered office of the company.

It is expressly forbidden to give any type of gifts or hospitality to public officials or authorities.

The receipt of any type of gift authorized by this policy, the acceptance of unauthorized gifts that could not be refused and those that have been expressly rejected, shall be reported to the Management Body with the necessary data for their filing and registration, which shall also be

responsible for proposing the destination to be given to them by the Governing Body.

## V. BAN ON DONATIONS TO POLITICAL PARTIES

Donations to political parties are expressly prohibited, in accordance with the provisions of Law 8/2007 of July 4, 2007, on the financing of political parties.

## VI. RELATIONS WITH PUBLIC ADMINISTRATIONS

PRAXIA ENERGY maintains with the Public Administrations the relations of a private company necessary for the performance of its activity and the fulfillment of its obligations.

In its relations with public administrations and institutions is committed, and so moves it to all members, to compliance with the highest ethical standards, pledging to:

- Respect applicable laws, rules, procedures and principles.
- Not to provide or promise gifts, gifts or attentions to any official, official or representatives of national, regional or local government and not to receive them from them.
- Not to offer employment or business opportunities, or services of personal utility to representatives of public administrations or senior public officials, or their relatives.

- Not to incur unjustified representation expenses in relations with public administrations for purposes other than the achievement of the corporate purpose.
- Not to lend, promise, give, request or obtain confidential or other information or documents that jeopardize the integrity or reputation of one or both parties.
- Ensure that all communications, including reports, statements, declarations, manifestations, proposals and claims made to public administrations or institutions are correct, clear, complete, true and transparent and are made, whenever possible, telematically for the purpose of keeping the corresponding submission and processing documents.
- We will collaborate effectively with public administrations, providing the required information in due time and form.
- Likewise, the strictest confidentiality of sensitive information that may be obtained in relations with the Public Administrations shall be maintained, adequately safeguarding any confidential data that may be obtained.

## VII. MANAGEMENT OF PUBLIC AID AND SUBSIDIES

The application and processing of public grants and subsidies by PRAXIA ENERGY will observe in any case the highest ethical standards and truthfulness. All members of PRAXIA ENERGY are committed in this regard to:

- Comply truthfully and correctly with the requirements requested by the aid or subsidy, using and submitting complete, true and real statements and documents.
- To use the public aid or subsidies, once obtained, for the purposes for which they were requested and granted.
- To comply scrupulously with the conditions set forth in the financing contracts signed.
- To adequately justify the application of the funds received.
- To satisfy the taxes corresponding to the same.

## VIII. USE OF CORPORATE CARDS

The assignment of corporate credit or debit cards shall be the responsibility of the Chief Financial Officer with the prior written authorization of the Administrator.

Upon delivery of the corporate credit or debit card, the recipient must sign a receipt document stating the permitted and unacceptable uses of the card, as well as the manner of justifying the expenses incurred with the same.

The withdrawal or cancellation of the corporate credit or debit card shall also be carried out by the Chief Financial Officer, with prior authorization from the Administrator and prior notice to the cardholder.

The causes for withdrawal or cancellation of the card shall be the termination of the contractual relationship with the company for any reason, non-compliance with the rules of use of the card and the unilateral decision of the Administrator.

### **Uses and conditions:**

The corporate card may only be used for the following payments:

- a) Payment for meals with clients provided that prior notice has been given of the meal or meeting and of the possibility of using the card at the same.
- b) Hotel and lodging payments for previously authorized business trips.
- c) Payment of cab or transportation services for work purposes and previously authorized vehicle rental.
- d) Payment of supplies or materials necessary for the development of the activity.
- e) Other previously authorized representation expenses.

The use of the corporate credit or debit card for personal expenses, cash withdrawals from ATMs and salary advances is strictly prohibited.

Corporate cards are personal and non-transferable and will have a maximum spending limit assigned at the time the card is issued to the

cardholder.

### **Justification of expenses:**

All expenses and payments made with the corporate credit or debit card must be properly justified in accordance with the provisions of this policy. Within a maximum period of one month after any payment has been made using the corporate card, the documents supporting the payment (invoice and/or ticket) must be submitted to the Chief Financial Officer together with the prior authorization document (e-mail stating the prior authorization).

The Economic-Financial Director shall make a monthly comparison of the expenses and payments made with the corporate card with the data recorded in the bank account, and must certify that they are duly justified and authorized. In the event that there are payments made with the corporate card that lack the necessary documentary justification, the employee shall be required to provide them, and if he/she does not have them, his/her immediate superior shall be required to validate the aforementioned expenses. However, the existence of three requests for justification of expenses without them being provided by the employee shall be grounds for withdrawal and cancellation of the card.

Likewise, any use of the corporate card in contravention of the limitations set forth in this policy will be grounds for withdrawal or cancellation of the corporate card.

## IX. CONTRACTING OF SUPPLIERS AND THIRD PARTIES

PRAXIA ENERGY will make a diligent recruitment of suppliers, collaborators or business partners, ensuring that persons and companies that maintain professional or commercial relationship with it comply with the ethical standards required by its internal regulations.

Under no circumstances shall relations be maintained with individuals or legal entities whose purposes or activities are not known or have not been verified, or with companies or persons linked to or sanctioned for terrorism or money laundering.

All suppliers shall fill out the SUPPLIER IDENTIFICATION FORM (APPENDIX I), without which PRAXIA ENERGY will not initiate the relationship with the supplier.

The evaluation of suppliers will be in accordance with the principles of equality, objectivity, sustainability and in its commitment to business ethics, PRAXIA ENERGY reserves the right not to maintain relations with suppliers who are not aligned with the principles of sustainability of the company or do not respect this policy or the crime prevention system implemented in the company.

Contracts signed with third parties shall include the clause of the necessary commitment to this anti-corruption policy and PRAXIA ENERGY's code of ethics, which must respect the principles and obligations required by the company, and whose breach may lead to the termination of the contract. PRAXIA ENERGY employees, in their relationships with suppliers, should avoid situations where their personal interests may conflict with those of the company. Any actual or potential conflict of interest must be immediately

disclosed to the management body for evaluation and management.

## X. ACCOUNTING AND GOOD TAX PRACTICES

The company will observe the strictest ethical conduct in the keeping of its accounts and in the fulfillment of its tax obligations in accordance with the procedures set forth in this policy:

### **a) ACCEPTED MEANS OF PAYMENT**

- a. Bank transfer or direct debit
- b. Payment in cash up to the limit of 1000 euros per service, being expressly forbidden the splitting of invoices with the purpose of exceeding the aforementioned limit.
- c. Wages and salaries shall be paid through the current account designated by the employee.

Suppliers, collaborators or subcontracted companies shall be required in all cases to provide a certificate of ownership of the bank account, both at the beginning of the relationship with them and in all cases in which they request a change of payment account. In order to avoid any type of fraud, in all those cases in which a request is received from the supplier, collaborator or subcontracted company to change the payment account, whether the change request is made by telephone or by mail, the pertinent verification will be carried out by means of a call or email INDEPENDENT AND DISTINCT (outside the thread of that email) from the one sent by the supplier, in order to verify the new bank account number. In any case, a certificate of account ownership will be requested.

Special care and caution will be taken with payments that must be

made to accounts or companies domiciled in tax havens or non-cooperative territories, and a certificate of account ownership in the name of the supplier, collaborator, or subcontractor must also be requested.

### **b) Payments**

The collection of invoices or receipts will be carried out in any case by bank transfer, direct debit, bank check, or nominative voucher. The collection of invoices or receipts will be carried out in any case by bank transfer, direct debit, bank check, or nominative check. Cash payments will only be accepted up to a maximum amount of 1000 euros per service rendered, and the splitting of invoices to exceed the stated limit is not allowed.

Only cash payments up to a maximum of 1000 euros per service provided will be accepted, and invoice splitting to exceed the stated limit is not permitted.

Only cash payments up to a maximum of 1000 euros per service provided will be accepted, and the splitting of invoices to exceed this limit is not allowed. All invoices must be presented with the corresponding taxes, duly numbered and identified in accordance with current regulations. All invoices will be presented with the corresponding taxes, duly numbered and identified in accordance with current regulations.

### **c) Bank reconciliation**

Monthly, the economic-financial area will carry out bank reconciliation, through which it will be ensured that the company's bank transactions match the accounting records.

## XI. ETHICAL CHANNEL

Compliance with this policy is mandatory for all members of PRAXIA ENERGY. Any non-compliance with it must be reported to the Compliance Officer through the Ethical Channel.