

A woman with long dark hair, wearing a bright orange knitted sweater, is shown in profile from the chest up. She is holding a dark grey laptop in front of her. She is looking towards the right side of the frame. The background is a blurred city skyline at sunset or sunrise, with warm golden light. A wooden railing is visible in the lower right foreground.

kovecta

Compliance Framework Policy

Corporate Policies 2025

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01

Purpose

The objective of this Compliance Framework Policy (hereinafter, the “Policy”) is to establish and disseminate the basic and general rules of Konecta, a multinational group of companies specialising in the provision of digital customer management services and solutions (hereinafter, Konecta, the Company or the Firm), in terms of compliance with applicable regulations, including criminal law, which allows for the development of honest, ethical and transparent professional conduct in line with human rights, as well as showing firm rejection of any kind of irregularity, without, in any case, its commission being justified on the basis of a benefit for the organisation.

In this regard, Konecta's Management Body has worked on the implementation of a Compliance and Criminal Risk Prevention Model (hereinafter, the “Compliance Model” or the “Model”), thereby reinforcing and promoting an ethical business culture that establishes appropriate control and management mechanisms in the area of detecting and preventing regulatory risks and non-compliance, whether directly or indirectly, expressly stating its rejection of any illegal or unethical act.

Konecta's corporate governance system is inspired by and based on a commitment to ethical principles, integrity and leadership in the application of best practices, structured around the defence of social interests and the creation of sustainable value for the company, its employees, suppliers and customers. As such, this Policy is an extension of Konecta's regulatory framework and responds to the expectations of its stakeholders (employees, customers, partners and shareholders, investors, financial institutions, suppliers, public administration and regulatory bodies), ensuring scrupulous compliance with the laws and regulations in force in each country, its own requirements and international standards.

This Policy develops the provisions of the Code of Ethics, as well as the company's existing internal policies, manuals and procedures on the subject.

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Scope of application

This Policy applies globally to all Konecta entities as part of its Compliance Programme and is endorsed by the company's senior management.

Every member of the company is responsible for promoting the principles and commitments set out herein in their workplace. Consequently, it must be observed by all Konecta employees, regardless of their position or role within the organisation or their geographical location, in relation to the activity they carry out and which has been deemed to expose them to certain criminal risks.

Notwithstanding the foregoing, Konecta will encourage the application of this Policy to all individuals and/or legal entities linked to the company by a relationship other than employment: suppliers, contractors and workers in the supply chain, and business partners, in compliance with the Law and as a demonstration of due diligence.

Given that many of Konecta's companies have their registered office outside the European Union, internal regulations will be adapted to the regulations of each State where necessary, respecting and ensuring compliance with the basic principles set out herein.

In addition to this Policy, there is a criminal risk matrix that lists the behaviours classified in Article 31 bis of the Spanish Criminal Code, according to which companies could be investigated in Spain for crimes committed in the name or on behalf of the companies and for their direct or indirect benefit, (i) by their legal representatives and de facto or de jure administrators, or (ii) by persons subject to their authority, when the commission of the offence, in the latter case, is the result of a lack of proper control, taking into account the specific circumstances of the case.



03

General principles of action

Konecta has embraced the desire to promote a culture of ethics and compliance, respect for applicable regulations and voluntarily assumed commitments, as well as adaptation to best practices in compliance that enable the development of diligent professional conduct, demonstrating the company's firm condemnation of any kind of illegal, criminal or other act, which cannot be justified on the basis of a benefit to the organisation.

Konecta's Compliance Model includes the organisation's criteria for action and control elements that prevent non-compliance with obligations and commitments within its sphere of activity. Without prejudice to the provisions of the Code of Ethics, Konecta's Compliance and Criminal Risk Prevention Model is based on the following general principles, which constitute the fundamental basis of both the company's internal regulations and the conduct of its employees:

Foster a culture of prevention based on the principle of “zero tolerance” towards the commission of irregularities in any regulatory area, promoting the application of the principles of ethics and responsible behaviour by all professionals acting on behalf and/or representing Konecta.

- Absolute rejection of any act that could be considered a crime: Konecta is firmly committed to ensuring compliance with current criminal law and does not accept any type of infringement in relation to it.
- Absolute rejection of any type of conduct that could be construed as corrupt: both in relations with civil servants and public administrations, and with other third parties with whom business relations are maintained.

Compliance with the law and internal regulations: Konecta, and in particular its Management Body and its directors, shall act and require all employees to act at all times in accordance with the provisions of current legislation and the Criminal Risk Prevention and Compliance Model.

- Compliance with accounting obligations and financial reporting: Konecta's financial reporting shall be prepared with reliability and rigour, complying with all internal control procedures established to ensure the correct accounting of transactions and their accurate reflection in Konecta's financial reporting.
- Respect for intellectual and industrial property: Konecta employees shall respect the intellectual property and right of use belonging to the company in relation to courses, projects, computer programmes and systems, knowledge, processes, technology, know-how and, in general, other works and projects developed or created by Konecta or any third party.
- Protection of personal data: Konecta employees shall protect the personal data of both employees and any other persons whose data may be accessed as a result of Konecta's activities, in accordance with applicable regulations and in compliance with the company's internal processes.
- Secrecy and confidentiality: Konecta employees shall maintain professional secrecy with regard to any non-public data or information they become aware of as a result of their professional activity, whether it originates from or refers to customers, suppliers, Konecta, employees, managers or any third party.

- Equal opportunities and non-discrimination: in access, promotion, training, remuneration and other working conditions, with the principle of objectivity taking precedence in all actions and decisions.

Relationships with third parties:

- Provide a regulatory and compliance framework with those third parties with whom we may have business relationships, in order to ensure integrity and honest practices within the framework of free competition.
- Ensure Konecta's commitment to its customers through the creation of quality services that contribute to meeting customer requirements and expectations.

Within this framework, the Grupo absolutely rejects any type of advertising, commercial or promotional activity that misleads or may mislead its customers, committing to providing clear information about its services.

- Promote self-control processes in the actions and decision-making of Konecta members, so that they take into account four basic premises:
 - (I) that the action complies with the Code of Ethics;
 - (II) that it is legally valid;
 - (III) that it is aligned with the company's strategic objectives;
 - (IV) that it falls within the scope of their competences and that, therefore, they must assume responsibility for it.
- Develop specific procedures for the prevention, detection and management of non-compliance, such as internal audits, periodic controls or risk assessments, in order to anticipate possible infringements and respond in a structured and effective manner.
- Prevention of criminal risks: the company is committed to risk prevention, including those of a criminal nature. To this end, and in accordance with Spanish legislation, Konecta has implemented a Criminal Risk Prevention Model.
- Strengthen the authority and independence of the Compliance Committee as the body responsible for ensuring the proper functioning of the Compliance Model, as well as other applicable internal regulations.
- Disseminate among the members of the organisation the rules, policies and procedures that should govern their actions within the Grupo and the necessary tools for this purpose.
- Raise awareness, train and sensitise (as appropriate in each case) both the members of the organisation and the value chain of the importance of acting in accordance with current legislation and complying with the commitments voluntarily assumed by Konecta in the performance of its duties.
- Make the appropriate information channels available to all members of the organisation, establishing the duty to report and denounce in good faith any irregular conduct of which they are aware or suspect. Konecta guarantees, in all cases, the confidentiality of those reported and those reporting, as well as the absence of reprisals against those reporting in good faith.

- Environmental protection: Konecta is actively and responsibly committed to environmental conservation, complying with legal requirements and striving to reduce the environmental impact of its activities.
- Occupational risk prevention: Konecta is aware of the importance of the health and safety of its workers, establishing the achievement of physical, mental and social well-being as a fundamental pillar within the company's preventive culture.

These principles of action respond to the impacts, risks and opportunities (IROs) arising from material issues related to corporate governance.

Basis of the Model

Konecta's Criminal Risk Prevention and Compliance Model (hereinafter, the Model) is a compilation of the procedures and controls in place within the Grupo that prevent, detect or enable a response to the commission of possible illegal acts and is part of Konecta's Compliance Programme. It essentially comprises the following elements:

- Compliance Committee: is the body responsible for ensuring the proper functioning of the Model, with the independence and authority necessary to perform its duties.
- Compliance Function Statute: establishes the basis for the Compliance Function, its bodies and those responsible for it, as well as its interrelationship with other areas and stakeholders, defining its principles of action and internal regime.
- Compliance Framework Policy: highlights the Grupo's rejection of any unlawful behaviour and its commitment to ethics and compliance and its members to act with integrity.
- Code of Ethics: Konecta has a Code of Ethics accessible to all its employees, which sets out the values, principles and guidelines of conduct that must govern the professional behaviour of the Grupo.
- Code of Ethics for Suppliers: its purpose is to establish the minimum standards and commitment that the company's suppliers must maintain with regard to the basic principles of ethics, honesty and professionalism.
- Criminal risk map: this forms the basis for identifying the criminal risks to which Konecta is exposed due to its activities.
- Information channels: Konecta has a communication channel that allows employees to report any potentially significant irregularities that, in their opinion, constitute a violation of the principles set out in the Compliance and Criminal Risk Prevention Model.
- Supervision and monitoring system: the supervision and monitoring system allows for continuous validation of the implementation of the Model, periodically checking the effectiveness of existing policies, procedures and controls, as well as their evolution, so that the company has an overview of the activity carried out in this area, enabling it to take the necessary actions to

ensure its adequacy and effectiveness in the performance of its risk prevention, management and control functions.

- Economic and financial management model: Konecta has a series of controls and procedures in place in the financial and economic sphere that ensure full transparency and accuracy in its accounting records, transactions and, in general, the Grupo's economic management.
- Disciplinary system: all Konecta employees are required to comply with the Code of Ethics and the company's policies and procedures; therefore, any conduct contrary to this obligation will result in disciplinary measures being applied in accordance with Konecta's internal regulations, which in no case will be contrary to applicable labour regulations.
- Modelo de gestión económico-financiero: Konecta cuenta con una serie de controles y procedimientos en el ámbito financiero y económico que dotan de plena transparencia y fidelidad a sus libros contables, sus transacciones y, en general, a la gestión económica del Grupo.
- Sistema disciplinario: todas las personas trabajadoras de Konecta están obligadas a cumplir con el Código Ético, las políticas y procedimientos de la compañía; por tanto, cualquier conducta contraria a esta obligación supondrá la aplicación de medidas disciplinarias de conformidad con la normativa interna de Konecta, que en ningún caso serán contrarias a la normativa laboral aplicable.

Roles and responsibilities

- All employees to whom this Policy applies must comply with it and take the necessary actions to follow it, in accordance with their duties and responsibilities, as well as attend any training sessions they are required to attend related to it and the principles of action it advocates.
- Board of Directors and Board Committees: approval or modification of Konecta's general policies and strategies.
- This Policy reinforces the commitment of Konecta's Board of Directors and Senior Management to defending compliance with the law, as well as communicating and disseminating the principles contained in the Compliance and Criminal Risk Prevention Model.
- Due to its proximity to strategic and operational objectives and its hierarchical position, Senior Management is responsible for directing and supporting all members of the Grupo in the exercise of their compliance obligations, ensuring the availability of adequate and sufficient resources for the effective implementation of measures.
 - Participates in the analysis and assessment of criminal risks when required to do so.

- Compliance Committee:
 - It is the body responsible for ensuring the proper functioning of the Model, with the independence and authority necessary to perform its duties.
 - Review the criminal risk matrix.
 - Ensure the diligent processing of communications regarding breaches of the Compliance Model, guaranteeing the confidentiality of information at all times.

- Compliance Department:
 - Ensure the effective implementation of this Policy through appropriate measures, including the development of a monitoring system.
 - Promote training and awareness of this Policy.
 - Support the different areas of the company in the implementation of this Policy.

Communication and training

This Policy will be available on the corporate website (www.Konecta.com).

Prevention and responsibility

Both employees and any third party who suspect the existence of any potential breach related to this Policy may submit their information, questions or concerns on this matter, confidentially and without fear of reprisals, through the Information Channels available on Konecta's corporate website (<https://Konecta.integrityline.com>), in accordance with procedure PG COR 26 Information Channels, available on the same website, which specifies the different channels available and the nature of the communication that can be made through them.

This channel is available 24 hours a day, 7 days a week. No retaliation will be tolerated against anyone who, in good faith, reports facts that could constitute a breach of this policy, and the guarantees and protections established by the applicable regulations and legislation will apply to the reporting parties.

Breaches of the Code of Ethics will be subject to the corresponding disciplinary measures in accordance with internal rules and procedures, without prejudice to any administrative or criminal penalties that may also result from such breaches and which may be imposed by the competent authority.

04

Updating and revision

The Compliance Framework Policy will be reviewed and updated periodically, or whenever necessary to adjust it to changes in the business model, or that may occur within Konecta's field of activity, or as a result of the approval of directly applicable regulations, ensuring its effectiveness and continued compliance.

NOTE: This Policy has been reviewed and approved on December 16, 2025, by the highest governing body and replaces any previous version of it, with only this document being valid from this date onwards.

Version Control

Version	Review date	Reviewed	Validated	Approved	Reason for change
1	12/19/2022	Compliance Organization & Procedure	Legal Affairs	Board of Directors	Initial edit
2	12/16/2025	Compliance Organization & Procedure	Legal Affairs	Board of Directors	Alignment with legal requirements Alignment with the new format and branding Consolidation of the framework policy and its dependent policies into a single document