



CRIMINAL COMPLIANCE POLICY

haizea
windgroup

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1. INTRODUCTION

Haizea Wind Group (hereinafter "HWG") is an industrial group operating in the wind energy sector, focused on the manufacture of large metal components and the development of industrial solutions for onshore and offshore projects.

As an essential part of its business, HWG is committed to acting with integrity, responsibility, and full respect for the legal framework, promoting a culture of regulatory compliance and zero tolerance for any illegal conduct.

In accordance with HWG's Mission, Vision, and Values, this Criminal Compliance Policy establishes the corporate framework designed to prevent the commission of crimes, strengthen ethics and transparency within the organization, and minimize HWG's exposure to potential criminal liability, as stipulated in the Spanish Criminal Code.

To achieve these objectives, the Policy is based on a set of principles that guide the behavior of all HWG employees and inform their actions regarding criminal compliance.

2. COMMITMENTS AND PRINCIPLES

This Policy is developed in accordance with the Spanish Penal Code and following the guidelines of Standard UNE 19601:2017, ensuring that the Criminal Compliance Management System (hereinafter "CCMMS") conforms to recognized standards of crime prevention and criminal risk management.

This Policy defines the principles and commitments that guide the conduct of all HWG members and related third parties, ensuring that integrity, prevention of criminal risks and a culture of compliance are fundamental values of HWG.

As part of this commitment, HWG assumes, among others, the following commitments:

- Zero tolerance and defense of legality: To establish and defend as a fundamental value that all actions of personnel are always in accordance with the legal system, in general, and with criminal law, in particular.
- SGCP Management: Adopt, implement, maintain and continually improve a Criminal Compliance Management System suitable for preventing and detecting crimes.
- Resources: Provide the Regulatory Compliance Committee (hereinafter "CCN") with adequate and sufficient financial, material and human resources for its effective operation.
- Monitoring and Follow-up: Periodically evaluate the effectiveness of the SGCP, making adjustments and improvements in response to serious non-compliance or changes in the structure or activity of HWG.
- Dissemination and Culture: Ensure that all HWG members and related third parties understand, embrace, and apply the principles and objectives of the SGCP.

- Prevention and management of criminal risks: HWG is committed to continuously identifying, assessing and managing criminal risks arising from its activities, including relationships with public authorities, fraud, corruption, environmental crimes, workplace safety and financial operations.
- Internal controls and decision-making: HWG implements controls and procedures that ensure correct decision-making, preventing conflicts of interest and minimizing exposure to potential criminal liability.
- Continuous Improvement: Encourage the constant review of internal processes and controls, promoting the prevention of criminal risks and the efficiency of the system.

This Policy is based on the following principles, which guide all actions of the organization:

- Legal and Regulatory Compliance: All activities are carried out in accordance with applicable laws, rules and regulations, especially those related to the prevention of crimes and criminal risks.
- Ethics and Integrity: Promote a culture based on honesty, transparency and ethical behavior in all operations and relationships, both internal and external.
- Leadership responsibility: The Board of Directors leads the implementation of this policy, demonstrating its commitment to a culture of compliance.
- Zero Tolerance for criminal conduct: Illegal acts, corruption, bribery, fraud or violations of corporate ethics are not permitted.
- Responsibility and Diligence: Each HWG member assumes responsibility for respecting the rules and applying internal controls to protect the organization against criminal risks.
- Protection and Confidentiality: Guarantee confidentiality and protection from retaliation for those who report possible breaches.
- Transparency and Trust: Fostering relationships based on trust and clarity, ensuring traceability and control of critical processes.
- Culture of prevention: Integrate the prevention of criminal risks as part of the corporate culture and management system of HWG.
- Leadership of the Board of Directors and Senior Management: Leadership in the implementation of this Policy is an active commitment of the Board of Directors and Senior Management.

3. SCOPE AND RESPONSIBILITIES

This Policy applies to all activities carried out by HWG and is mandatory for:

- All the companies that make up HWG.

- Members of the Board of Directors, Senior Management, department heads and staff of each entity.
- Third parties linked to HWG (collaborators, suppliers, contractors) that may pose criminal risks to the organization.