

CRIMINAL COMPLIANCE AND ANTI-BRIBERY POLICY

APPROVED BY THE BOARD OF TRUSTEES AT ITS GENERAL MEETING HELD ON MARCH 18, 2025.



FUNDACIÓN REAL ESCUELA
ANDALUZA DEL ARTE ECUESTRE

Andalucía



Junta de Andalucía

CRIMINAL COMPLIANCE AND ANTI-BRIBERY POLICY

STATEMENT OF COMMITMENTS

The Board of Trustees of the Fundación Real Escuela Andaluza de Arte Ecuestre (FREAAE) is firmly and continuously committed to complying with all applicable laws and regulations, upholding a zero-tolerance approach to any unlawful conduct, expressly prohibiting the commission of criminal offenses, and actively participating in the fight against fraud and corruption in all areas of its business activities. To this end, it adopts and approves this Criminal Compliance and Anti-Bribery Policy.

PURPOSE

By approving this Policy, the Foundation sends a clear message to trustees, directors, employees, and third parties with whom it interacts, expressing its unequivocal opposition to corruption and fraud in all their forms, as well as FREAAE's firm commitment to eradicating such practices from all its activities.

FREAAE promotes a Corporate Governance System comprising all policies, procedures, plans, protocols, and other measures designed to ensure that the Foundation conducts its activities in compliance with applicable laws and regulations and with its Code of Ethics, which constitutes its fundamental standard of conduct and operation.





SCOPE OF APPLICATION

The Criminal Compliance and Anti-Bribery Policy shall apply to all members of the Board of Trustees, executive management, and all employees of the FREAAE. It shall also apply to the “stakeholders” and interested parties with whom the foundation interacts. The FREAAE shall implement this policy in companies in which it holds or acquires a majority interest. In companies where its participation is minority-based, it shall establish agreements regarding crime prevention organization and management models aimed at mitigating or reducing criminal risk.

The FREAAE shall only maintain relationships with stakeholders or third parties whose principles are aligned with those of the organization. Such parties are expected to conduct their activities with integrity, professional ethics, and an active commitment to combating fraud and corruption. FREAAE shall implement a “Third-Party Code of Conduct”, under which third parties must firmly reject any form of corrupt practice, particularly bribery, and refrain from promoting, facilitating, participating in, or concealing any activities that are contrary to applicable laws and regulations.

PRINCIPLES OF CONDUCT

The Policy is governed by the following principles:

A. The FREAAE conducts its business activities in full compliance with applicable laws and regulations and requires all members of its organization to comply with applicable criminal legislation and the Company's internal rules and procedures.

B. In accordance with its organizational purposes, the FREAAE conducts its business activities under a compliance culture based on a principle of “zero tolerance” towards corruption in business dealings, as well as any other unlawful acts or fraudulent conduct.

The principles of cooperation, transparency, and integrity shall govern the relationships of FREAAE's directors, employees, and representatives with public authorities, public officials, government agencies, state-owned enterprises, political parties, and any other entities or individuals involved in the exercise of public functions.





- C. The FREAAE has implemented a crime prevention organization and management system, including risk maps that identify the activities in which criminal offences may arise, and has established controls, procedures, policies, and protocols aimed at mitigating, reducing, or eliminating such risks.
- D. The FREAAE expressly prohibits any conduct that may constitute a criminal offence or otherwise expose the Company to legal, financial, or reputational risk. It does not tolerate, permit, or participate in any form of corruption, extortion, bribery, or fraud in the conduct of its business activities, whether in dealings with the public sector or the private sector.
- E. The FREAAE has implemented a criminal compliance and prevention model that minimizes the company's exposure to the range of criminal risks established under the legislation currently applicable to legal entities. The risks associated with fraud, corruption, and bribery are adequately addressed in all of FREAAE's internal procedures and, in particular, in all processes involving interactions with third parties.

F. The FREAAE has implemented internal regulations that provide an appropriate Corporate Governance System framework for the definition, review, and achievement of its established criminal compliance objectives. It measures the performance of its crime prevention model through key indicators, ensuring that all its components operate effectively, and promotes its continuous review and improvement.

G. The FREAAE requires all individuals involved in the Company's Compliance function to commit to complying with the implemented Crime Prevention Model and, in particular, with all the requirements set out in this Criminal Compliance and Anti-Bribery Policy.

H. The FREAAE establishes the obligation to report any suspicious facts or conduct that may constitute a breach of its Corporate Governance System or the commission of any unlawful act that could give rise to criminal liability, as well as any conduct contrary to the standards of conduct set out in the Code of Ethics or in this Policy. To comply with this obligation, the FREAAE has implemented appropriate internal reporting channels to facilitate the communication of potential irregularities, including its Ethics Channel, available on the homepage of its website at www.realescuela.org, which enables its employees, professionals, and third parties with whom it interacts to report such conduct.



I. The FREAAE expressly prohibits any act constituting retaliation, including threats of retaliation and attempts of retaliation against individuals who submit a report through the different reporting channels implemented within the company.



J. The FREAAE maintains a commitment to the continuous improvement of the implemented crime prevention model, promotes an environment of transparency, ensures that it has the necessary material and human resources to monitor the effective, proactive, and autonomous operation and compliance with this Policy, and guarantees the authority and independence of the Compliance Committee.

K. The FREAAE implements ongoing compliance training and awareness programs for its employees and senior management, ensuring the continuous updating and reinforcement of their knowledge in this area through in-person and/or technological training methods deemed appropriate by the organization. In particular, employees and senior management receive training on the Code of Ethics for the purpose of preventing, detecting, and mitigating any conduct that may constitute fraud, corruption, or bribery.

L The FREAAE maintains relationships with its stakeholders and suppliers based on the principles of integrity, professional ethics, and the active fight against fraud and corruption.

Through FREAAE's Third-Party Code of Conduct, suppliers are required to accept the foundation's principles and values and comply with its policies, rules, and procedures relating to the prevention of corruption, bribery, and extortion. No supplier shall offer or grant, either directly or indirectly, any unauthorized gifts, presents, or other benefits—whether in cash or in the form of other advantages—to public officials, third parties, or any FREAAE employee in connection with business activities carried out for or on behalf of FREAAE, with the aim of obtaining preferential treatment in the award or retention of contracts, or securing personal benefits or advantages for the supplier company.

M. The FREAAE states that the consequences of failing to comply with this Policy, the Code of Ethics, as well as any internal rule of the crime prevention model implemented, shall be disciplinary action, in accordance with the applicable legislation in force at any given time and the current collective bargaining agreement.

MONITORING, EVALUATION AND REVIEW

Monitoring

The Compliance Committee is FREAAE's collegiate body entrusted with the functions related to criminal risk prevention. It is responsible for promoting and overseeing the effectiveness of the Criminal Compliance and Anti-Bribery Policy, ensuring its implementation, development, and compliance, without prejudice to the responsibilities assigned to other governing bodies, management functions, areas, or departments of the organization.

The Compliance Committee fosters a culture of prevention and respect for the law among all FREAAE employees. It is vested with the necessary powers of initiative and oversight to monitor the operation and effectiveness of this Policy, which is based on the principle of zero tolerance and the application of the principles and values set out in the Code of Ethics.

Evaluation

The Compliance Committee shall assess the operation and effectiveness of this Policy at least once a year. It shall promote amendments to this Policy whenever relevant circumstances arise as a result of breaches of the crime prevention model or any other circumstance that it deems appropriate.

Review

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