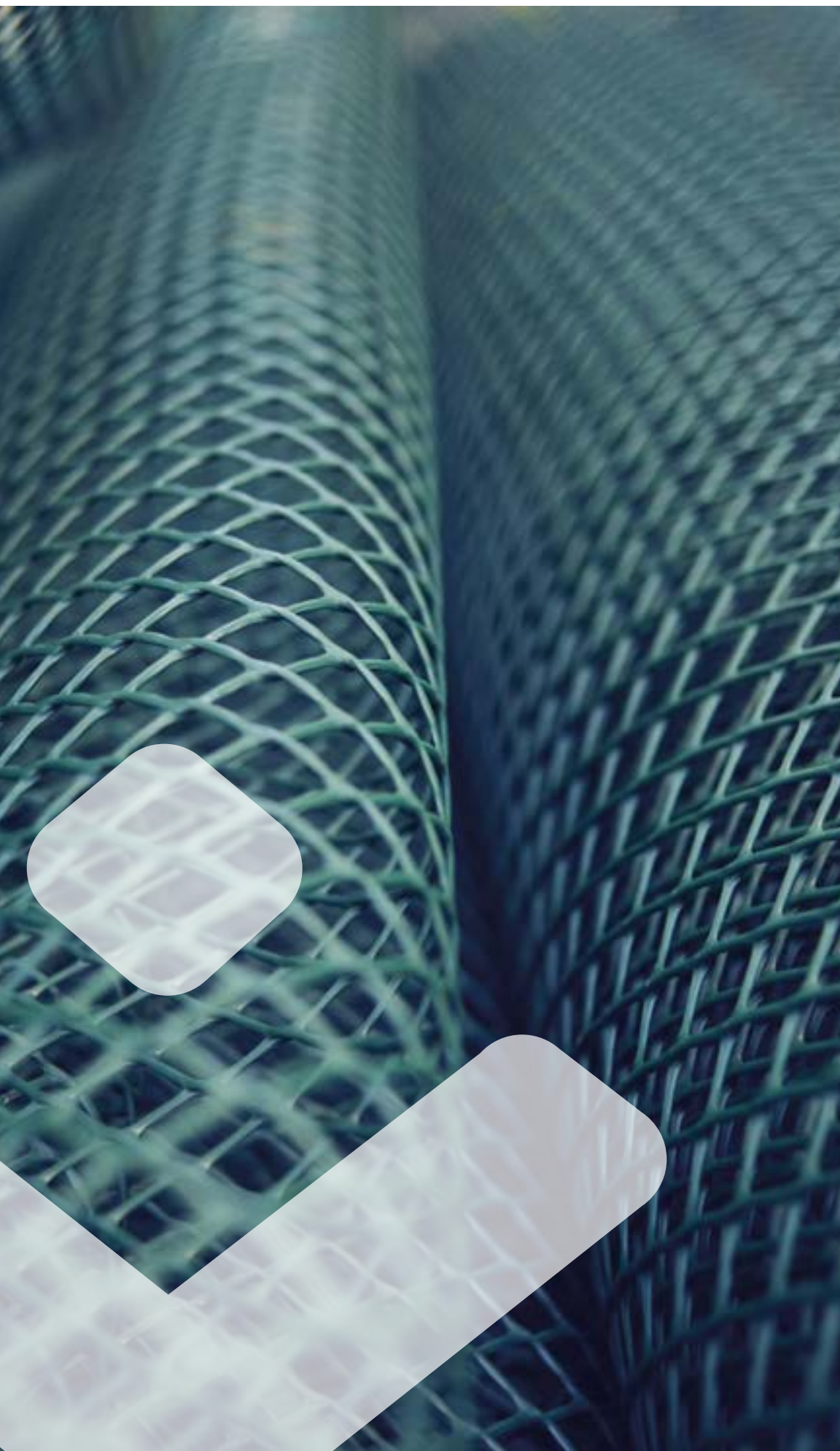


Legal Compliance Policy



 intermas group

Document revision

Author Ethics and Compliance Committee

Date 30.12.2021

Changes description -

Version 1.0

Aproval François Mouchet

Author

Date

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Version 1.1

Aproval

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Changes

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Purpose

The purpose of this Policy is to outline the Director of Interimas' commitment to the active management of regulatory compliance in general and to the prevention of crimes, in particular those of a corporate nature.
This Policy will apply to all employees, executives and to the Director of Interimas.

Scope

This Policy will apply to all employees, executives and to the Director of Interimas. They must all respect this Policy, its principles and the actions deriving from it.



Principles and commitments

They must all respect this Policy, its principles and the actions deriving from it.
The principles laid down by this Policy are the following:

1. **Legality**, understood as respect for and compliance with current legislation.
2. Due diligence, understood as the need to obtain and analyse information in order to make correct decisions.
3. **Risk management**, prioritising cases that may pose a greater risk to the organisation or to society as a whole.

Intermas will set up a framework for identifying and controlling the legal requirements that apply to the company's main activity, including preventable crimes that may result in the corporation being held criminally accountable.

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The Ethics and Compliance Committee, created by the Sole Director of Interma, is a body which has the autonomous power of initiative and management, and is responsible for overseeing the performance and enforcement of this framework ("**Supervisory Body**"). Likewise, it will also contain a Compliance Coordinator whose job will be to maintain and bolster the prevention of crimes within the organisation.

In addition, Interma will advocate regulatory compliance and crime prevention among company members who behave in an irregular manner which may result in legal or criminal consequences for the Organisation.



All criminally reprehensible behaviour is expressly forbidden and it may not be imposed on any individual or third party, nor may its imposition be suggested by a person in a position of power. In this sense, Intermas will:

- Identify the activities that may give rise to crimes that may possibly result in the corporation being held criminally accountable.
- Manage exposure to criminal risk by seeking to mitigate it through the implementation of preventive measures and controls that are organised and prioritised by means of objectives and action plans.
- Provide training to its employees and executives.
- Implement internal mechanisms for enquiring about and reporting misconduct in a confidential manner and with the guarantee of there being no reprisals.

The reporting of illegal or criminal behaviour, or that which is suspected of being so, is compulsory for anybody who witnesses it or who has a reasonable basis for suspecting it.

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Non-compliance with this will be sanctioned in accordance with the applicable disciplinary system in each case, with the Director reserving the right to begin the necessary legal proceedings (civil and/or criminal) in the courts in the event that a crime is allegedly committed.



Communication

This Policy (and future updates) will be sent or made readily available to all recipients and will form part of Interimas' training plans.

It will also be sent to business partners and stakeholders when necessary to comply with the principles and commitments set forth herein.

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Control and monitoring

The Director will monitor the effectiveness of this Policy with the support of the Ethics and Compliance Committee, and he commits to continuously improve the framework set up for its implementation.



Procedure compliance records

Record / Evidence	Responsible department
Confirmation of compliance with Intermas' Criminal Risk Management System (and the Compliance Policy, if applicable)	Ethics and Compliance Committee

In Barcelona, 30 December 2021.

Signed: François Mouchet



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