

1. Purpose and Scope

The purpose of this Anti-corruption Policy is to formally set out Prodiel's firm and total prohibition of all conduct which can be classified as corruption or bribery, both in public and in private matters.

Its commitment to Good Ethics is one of the pillars of Prodiel's strategy. We cannot conceive any other way to do business than having this firm commitment to the strictest ethical standards and to strict compliance with our legal obligations. Prodiel undertakes to always act fairly and honestly in dealings with customers, partners, suppliers and third parties in general who work with us. Prodiel equally undertakes to ensure compliance at all times with the laws of each given country.

Prodiel prohibits all corrupt behaviour that, directly or indirectly, may exert undue influence on third-party decision-making (public or private entities).

This Policy must be adhered to by everyone at Prodiel and applies equally to all its subsidiaries irrespective of their specific business activities or geographic area, always bearing in mind the legal, cultural, social and economic differences of each particular country.

2. General anti-corruption principles

Prodiel will always carry on business pursuant to current legislation in force in all spheres of activity and in each country where it operates. For that reason, everyone at Prodiel must abide by the following action principles:

- 1 Personnel must never exert influence over the intention or objectivity of third parties in order to obtain any benefit or advantage by means of unethical practices and/or practices that contravene applicable law.;
- 2 Personnel may never directly or indirectly tender, promise or offer any valuable items to a third party in order to gain an improper advantage;
- 3 No facilitation payments are permitted;
- 4 Prodiel prohibits direct or indirect provision of finance or support to a political party, their representatives or candidates;
- 5 Donations must not be used to conceal improper payments;
- 6 Special attention must be given to scenarios in which a lack of integrity on the part of persons or entities with whom we do business is perceived, thereby ensuring Prodiel only ever does business with qualified persons and entities of due renown;
- 7 All the Company's operations and transactions shall be faithfully and properly set down in accounts books and records;
- 8 Any breach of this Policy must be reported promptly and appropriately.