



# COMPLIANCE POLICY

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## Owner of the Policy

Compliance

## Scope

This Policy will apply to Beton Bauen Ltd.

## Objectives

The purpose of compliance is for us to operate within the framework of regulatory compliance, in order to attain an environment of compliance. For this purpose, the compliance function:

- With regard to the regulations, assesses and reports on the exposure to legal risk of the activities carried out.
- Legal risk is defined as an event consisting of a regulatory, jurisprudential, or administrative change that may adversely affect the company.
- The compliance function identifies, assesses, monitors and reports on the risk exposure associated with any non-compliance with current legislation that may be incurred through our activities.

Non-compliance risk is defined as the risk of legal or regulatory sanctions, financial and material losses, or loss of reputation that may affect the company as a result of non-compliance with the laws, regulations, rules, internal and external standards or administrative requirements applicable to its activity.

The effective management of legal risks and non-compliance is regarded as a basic boost to sustainable and profitable growth. It also helps protect our solvency, integrity and reputation while supporting its strategic objectives.

## General Principles

The compliance function, as a key function within the governance system, forms part of the basis for strengthening its institutional commitment to conducting all its activities and businesses in line with strict rules of ethical behaviour.

The compliance function also contributes to the capacity to minimize legal and noncompliance risk, helping to raise awareness of compatibility with internal and external regulations and ensuring that this compliance is properly integrated in our culture and all its activities.

The compliance function is established as a single service and is responsible for ensuring that we operate within the compliance guideline framework.

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## Scope and Allocation of Responsibilities

### 5 Key Elements of Corporate Compliance

1. Leadership
2. Risk Assessment
3. Standards and Control
4. Training and Communication
5. Oversight

The compliance function is structured within the organisation and directly reports to the Directors, in relation to the following matters:

- Insurance contract
- Distribution of insurance policies
- Competition
- Market abuse
- Prevention of corruption and the criminal responsibility of legal entities
- Prevention of money laundering and financing terrorism
- International sanctions
- Exchange of information
- Marketing, communications and advertising
- Branding and other industrial property rights

Risks arising from matters whose competence corresponds to specific compliance areas are outside the scope of this document.

**1. To provide the following information to the Directors**

a) At least annually, an Activity Report summarizing the activities carried out in the previous period, to be prepared for and submitted to the governing body. In particular, information must be provided concerning overall results in the following fields:

- o non-compliance risk management
- o legal risk management
- o policy management, and
- o compliance training activities.

b) All persons shall immediately report any incident of non-compliance of which they gain knowledge, and which affects, or may affect, our activity. In this regard, events that may have a financial, material or reputational impact on the company are considered as incidents of non-compliance.

**2. To submit the Compliance Verification Plan annually**

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3. To advise the Directors on compliance with laws, regulations and administrative provisions affecting Beton Bauen Limited.
4. To identify and evaluate non-compliance risks in line with the methodology defined for managing the said non-compliance risk.
5. To identify and evaluate the impact of any modification to the legal environment in the operations, according to the methodology defined to manage legal risk.
6. To manage existing internal policies in line with the established management process.
7. To advise, where required, on new products, services and markets from the point of view of compliance, identifying and evaluating the legal and non-compliance risks associated with them, and participating in the corresponding committees that are constituted for this purpose.
8. To monitor the result of actions by construction bodies.
9. To monitor any violations of the relevant regulations and judicial decisions affecting the operation
10. To promote awareness among the personnel and ensure continuous training, to create a culture of compliance and to increase awareness of laws, regulations, standards, policies and procedures on compliance-related topics.
11. To ensure that personnel is adequately trained and supported to enable it to stay up-to date with compliance requirements.

Signed:



Position: Compliance Manager

Date: 05/01/2026