

CRIME PREVENTION MODEL

SUMA CAPITAL S.G.E.I.C., S.A., Sociedad Unipersonal (hereinafter "SUMA CAPITAL") implemented in 2020 a Crime Prevention Model in accordance with art. 31 bis of the Criminal Code.

Since 2020 SUMA CAPITAL has been working on the implementation and continuous development of an appropriate internal structure to prevent the commission of crimes within the organisation.

In this context, a single-person INTERNAL CONTROL BODY (ICO) was created, comprising a Compliance Officer in charge of coordinating and supervising the functioning and compliance with the implemented Crime Prevention Model.

A COMPLIANCE COMMITTEE was also created with the aim of streamlining the day-to-day decision-making process in the entity in terms of regulatory compliance, monitoring compliance and bringing the entity's governing body closer to the development and operation of the Crime Prevention Model. The aim of all this is to guarantee greater efficiency, agility and effectiveness of the Crime Prevention Model and the creation of a culture of compliance in the institution.

In execution of the action plan necessary to prevent the commission of crimes, SUMA CAPITAL has developed and implemented transversal controls and specific controls that are reviewed and updated on an ongoing basis.

In addition to the above, SUMA CAPITAL created a Whistleblowing Channel, subsequently adapted to Law 2/2023, as a high-level control measure, so that any direct member (directors, employees and professionals) or related person (collaborators or suppliers) can report any indication or suspicion of any conduct that could be presumed to have been committed:

- Non-compliance with applicable regulations, protocols, procedures, and internal controls
- Commission of acts that are not in accordance with ethical principles and good business practices.
- Commission of acts that could be considered as a crime.

Complaints are received by the Compliance Officer and an external advisor. Procedures are in place to avoid conflict of interest and to ensure maximum confidentiality.

You can access the complaints channel through the following link [Suma Capital - Denuncias \(factorialhr.es\)](https://factorialhr.es)