

CRIMINAL COMPLIANCE

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

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

In this context, a single-member INTERNAL CONTROL BODY (OCI) was created, composed of a Compliance Officer responsible for coordinating and supervising the operation and compliance of the implemented Crime Prevention Model.

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

In executing the action plan necessary to prevent the commission of crimes, SUMA CAPITAL has developed and implemented cross-cutting and specific controls that are reviewed and updated on a recurring basis.

In addition to the above, SUMA CAPITAL proceeded to create an Internal Information System, subsequently adapted to Law 2/2023, as a high-level control measure, so that any direct member (administrators, employees and professionals) or related party (collaborators or suppliers) can report any indication or suspicion of conduct that may involve:

- Breach of applicable regulations, protocols, procedures and internal controls
- Acts that do not comply with ethical principles and good business practices
- The commission of acts that could be criminal.

Complaints are received by the Compliance Officer and an external advisor. Procedures have been established to avoid conflicts of interest and ensure maximum confidentiality.

You can access the Internal Reporting System via the following link: [Suma Capital - Complaints \(factorialhr.es\)](https://factorialhr.es)