

The present Competition Compliance Policy (hereinafter, the "**Policy**") was approved by the Board of Directors of Pacadar S.A.U on 04 July 2022, and made available to all employees on the **intranet and corporate website** for mandatory compliance.

Through adoption this Policy, the Pacadar Group, by express decision of the Board of Directors of Pacadar S.A.U, assumes the **firm commitment of all the Group's employees to respect free competition**, not authorising or consenting in any way or under any circumstances that its members or employees may participate, even by omission, ignorance or mere negligence, in any form of anti-competitive, unfair or unlawful conduct, and establishing the necessary measures to prevent its commission.

Likewise, it formally ratifies its position of zero tolerance against any anticompetitive conduct that may be committed in the scope of the activities it carries out. The Pacadar Group is **firmly committed to ensuring free competition in the market**, developing our business competitively in all the markets in which we operate. Our objective is to ensure that all employees of the Pacadar Group **conduct themselves professionally with honesty, integrity and transparency**, as set out in our Code of Ethics.

For this purpose, we have equipped ourselves with **internal regulatory instruments and adequate control and management systems** in the field of detection and prevention of anti-competitive practices.

The present Policy requires **acting** in accordance with the provisions of current legislation on regulatory compliance and competition law and **refraining** from any action that could constitute collusive conduct between companies, abuse of a dominant position, unfair conduct that distorts competition or any other infringement or breach of the obligations provided for in the applicable regulations.

This policy is **mandatory** for all Pacadar Group employees, including directors and members of the boards of directors. Likewise, this policy will also apply to those third parties who formally adhere to it.

The OHLA Group's Compliance Department is in charge of ensuring compliance with and distribution of this Policy. Consequently, it is vested with **authority, independence and impartiality**, without affecting what is foreseen as its mandate and supervision by the OHLA Group's Auditing & Compliance Committee.

The OHLA Group's Internal Audit Department will conduct **periodic and confidential audits** of this Policy, as well as of other applicable rules and procedures

The OHLA Group commits to periodically arranging informative courses on this Policy, promoting compliance with it through **appropriate communication and training programmes, specific and adapted to the Group's activities** in order to prevent the commission of anti-competitive conduct of any kind.

The Pacadar Group's entire staff is obligated to report any fact, act, conduct or behavior that is contrary to this Policy.

Competition Compliance Policy

The Ethics Communication Channel provides the **necessary measures to detect possible breaches and to report conduct that may be associated with anti-competitive practices**. It is accessible on the intranet, web and by mail, at the following addresses:

<https://www.pacadar.es/ethics-and-integrity/ethical-chanel>

Ethics Reporting Channel of the Pacadar Group – Compliance Management.

Pº de la Castellana, 259D Torre Emperador. 28046 Madrid, España

OHLA Group's Auditing & Compliance Committee will ensure that an exhaustive analysis is completed of any potential infringements, always guaranteeing confidentiality and the absence of any retaliation.

Failure to comply with the provisions of this Policy may entail, in accordance with the local legislation applicable in each region, serious consequences for the Group, such as, among others, the imposition of fines, the limitation of the ability to contract with the Public Administration or possible claims for damages to any of the Pacadar Group companies and/or their managers.

Likewise, the Pacadar Group may apply the appropriate punitive measures (including, where appropriate, dismissal) to any employee and/or manager who commits any anti-competitive infringement, in accordance with the various applicable labour laws.

The present Policy will be subject to **review and continuous improvement**, especially when regulatory, social, business or any other circumstances so require.

Any questions, suggestions or recommendations regarding this Policy must be notified to the OHLA Group's Compliance Department.

The original document approved by the Board of Directors of Pacadar S.A.U is in Spanish. In the event of a difference between this translation and the original Spanish document, the Spanish version will always prevail.