



SISTEMAS
DE MISILES
DE ESPAÑA

Anti-corruption Policy

Sistemas de Misiles de España

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#

1 PURPOSE

SISTEMAS DE MISILES DE ESPAÑA, S.L. ("SMS" or "the Organisation") is a company committed to the fight against corruption, as reflected in its **Code of Ethics**. To strengthen the **ethical culture of the Organisation** and continue to show its rejection of corrupt practices, this **Anti-corruption Policy** has been enacted by the Board.

The purpose of the Anti-corruption Policy is to develop the content set out in the **SMS** Code of Ethics regarding anti-corruption matters, to prevent and detect any type of corrupt practices in which members of **the Organisation** may incur.

2 SCOPE OF APPLICATION

This policy applies to all areas and activities carried out by **the Organisation**, regardless of the territory or jurisdiction where **SMS** carries out its activity.

From a subjective perspective, the set of guidelines and principles for action contained in this document are mandatory for **all employees of the Organisation**, regardless of their hierarchical level and the roles they perform (the "**collaborators**"), including the **SMS** Board members.

Likewise, **SMS** will require related third parties to adopt ethical and conduct standards similar to those contained in this Policy.

3 CORRUPTION

Without prejudice to the specific definition established by each legislation, in general, corruption must be understood as all conduct consisting of "*offering, promising, giving or accepting an undue advantage to or by a public official, or an employee or representative of the private company, directly or indirectly, to obtain or conserve an illicit benefit or advantage*".

SMS prohibits the performance of any conduct or practice that could constitute an act of corruption, condemning all activities that entail a breach of the principles and guidelines for action contained in this policy or the anti-corruption regulations in force in the territories where it operates.

The collaborators of **the Organisation** are committed to perform their duties with integrity, rejecting any practice that may be unlawful or questionable from an ethical perspective, regardless of whether it could give rise to an advantage for **the Organisation** or for themselves.

4 GUIDELINES FOR CONDUCT

4.1 Offering and/or accepting gifts and hospitalities

SMS prohibits, in general, to request, accept, perform and offer gifts, hospitalities, services, invitations or other type of benefit or favour to any person or entity with which it is related.

Collaborators must reject gifts or hospitalities received when they become aware of such proposals. However, if their rejection is not possible, they must be returned to the issuer as soon as possible.

As an **exception** to this general prohibition, **SMS** allows practices of **usual and generally accepted courtesies in the sector**, provided that their receipt does not affect the objective and independent action of the collaborator. Acceptance of:

- Advertising objects given to make known the trademark or company in question and with a minimum value;
- Invitations to meals, dinners or events of an institutional or professional nature, provided that they take place occasionally.
- Gifts or details of low value, understood as not exceeding EUR 200. The receipt or offering of a gift or hospitality that exceeds that value must be reported to the **SMS** Compliance Officer, and in any case will be subject to prior authorisation and approval.

Gifts or hospitalities received or made by a collaborator of **the Organisation** must necessarily comply with the following **requirements**:

- They **must not** be contrary to **applicable legislation** and/or **SMS internal regulations**.
- They **must not** consist of cash, gift cards, cheques or any similar donations that **assume the delivery** of an **amount of money**.
- They **must not** be offered **so as to influence decision-making** and the **objectivity** and **independence** that must govern the performance of the professional activity of all **collaborators** and/or third parties with whom they relate.

Providing any type of gift, service or hospitality **to a civil servant or public authority** is **limited** to practices not exceeding **usual courtesy**.

All gifts or invitations that, by accepting or making them, **raise doubts**, must be reported to the **Compliance Officer**, who will decide whether they are appropriate or not as soon as possible.

4.2 Conflicts of interest

Conflict of interest refers to the **situation** that **affects** the **objectivity, neutrality** or **independence** of **employees** in the performance of their duties, in cases where **personal interests are prioritised before those of SMS**.

As provided in the Code of Ethics of **the Organisation**, a conflict of interest is understood to exist when in the professional performance of a collaborator –especially in a decision-making process–the collaborator's personal interest enters into collision, contrast or is influenced directly or indirectly (whether due to personal circumstances or activities, family relationships, assets or any other reason), with the interest of **SMS**.

It should be borne in mind that a conflict of interest may be real (an employee is effectively immersed in a situation that gives rise to a conflict of interest), potential (when employees are in a current or future situation that may affect their decision-making in the future and the exercise of their responsibilities) or apparent (there is no conflict of interest, but a third party could conclude that it does exist and this situation may be solved by providing all the information necessary to prove that there is no such conflict).

As regards the above, **personal interests** should be considered as:

- The collaborator's own interests.
- Family interests, including those of the spouse or person with whom this person lives in a similar relationship of affection, including relatives within the fourth degree of consanguinity or second degree of affinity.
- The interests of people with whom the collaborator has an obvious relationship of friendship or hostility.
- Any other interest that may affect the collaborator's objectivity or may be detrimental to the interests of **SMS**.

For example, the following situations could give rise to a conflict of interest:

- Collaborators participate in activities that compete with the interests of **SMS**.
- Collaborators use the information obtained in the projects in which **SMS** participates for their personal benefit, or for the benefit of a third party with whom they maintain any type of personal or professional relationship.
- Collaborators make commercial decisions influenced by personal, family or friendship interests.

When collaborators are faced with a potential conflict of interest, they must consider the following guidelines for action: act at all times with **independence** from their own interests or third-party interests; **communicate** in writing to the Compliance Officer the existence of a possible conflict of interest, with the aim of making the appropriate decisions in each specific circumstance, thus preventing their impartial action from being compromised; and lastly, **abstain** from intervening or influencing, directly or indirectly, in decision-making that may adversely affect **SMS**.

When collaborators have doubts as to whether or not they are faced with a possible conflict of interest, they must notify the **Compliance Officer**.

4.3 Travel and representation expenses

For the purposes of this Policy, travel and representation expenses must be understood as all **expenses incurred on behalf of the Organisation, relating to travel, accommodations, rental of vehicles and meals**.

The expenses incurred by the collaborators on behalf of the company must be **reasonable**, and must not be classified as excessive or extravagant. Likewise, they must not give rise to the presumption that they are being remunerated for any provision other than their own, or that the achievement of any parallel business is being facilitated.

4.4 Donations and contributions.

SMS collaborators must not make, on their own or through intermediaries, **donations or contributions to political parties on behalf of the Organisation** or in the **exercise of their corporate duties**, not even in the form of a loan or advance payment. This prohibition extends to federations, coalitions or groups of constituents, or any other person, if political parties happen to be the final recipients.

SMS states that it is not subject to any political ideology or trend; therefore, **the Organisation** rejects any conduct or practice of the collaborators that links, or may link, **the Organisation** with a specific political party or movement.

SMS may only make donations to non-profit organisations when they comply with the following requirements:

- The donation or contribution has been **approved** by the **CEO**.
- The donation or contribution is made in accordance with **the approved and designated budget** for this purpose during the current year.
- The **purpose** of the **beneficiary** organisation must not contradict or **violate** the **corporate values** and the **Code of Ethics** of **SMS**.

Any donation or contribution must be reported to the **Compliance Officer**, who will keep a **record of donations and contributions** made. That record must contain:

- Identification of the beneficiary organisation of the donation or contribution;
- Description of the donation or contribution;
- Value, or, if not known, an estimate of it or the amount provided;
- Purpose of the donation or contribution.

4.5 Relations with public authorities

SMS maintains a normal relationship with public authorities, which is based on cooperation and mutual respect between the parties. As a fundamental part of this relationship, the collaborators of **the Organisation** must relate to public authorities, officials and institutions in an **ethical and lawful manner, respecting**, at all times, **current legislation and regulatory standards on anti-corruption and bribery**.

In this regard, **SMS prohibits** the **delivery** or **promise** of any type of **gift, payment, commission** or **benefit**, directly or indirectly, to a **civil servant** or **employee** of a **Public Entity or Authority**, performed to obtain a benefit for **the Organisation**.

It is also **prohibited** to make the so-called "**facilitation payments**", i.e., the supply of small amounts of money to public officials to expedite certain routine administrative procedures.

Lastly, it is also **prohibited** to carry out **any form of influence peddling** that could give rise to preferential treatment for **the Organisation** or decisively influence a decision-making process.

5 COMMITMENTS REQUIRED OF THIRD PARTIES

In the framework of its fight against corruption, **SMS** expects the related third parties to take all necessary measures to prevent fraudulent practices, or acts constituting corruption or bribery within the scope of their organisations.

Likewise, to ensure that these third parties have ethical standards similar to those of **the Organisation**, **SMS** requires adherence to the content of this policy and to all corporate principles and values of **the Organisation**.

6 COMPLIANCE

Breach of any **SMS** internal regulations may constitute a punishable infringement, always in accordance with current employment regulations.

7 ENTRY INTO FORCE AND DISSEMINATION

This Anti-Corruption Policy was enacted by the Board of **Sistemas de Misiles de España S.L.** on 21 April 2023, at the proposal of the Compliance Officer of **the Organisation**. It will enter into effect at the time of its publication and is available to all collaborators.



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