



libelium

# Crime Prevention Policy

The Board of Directors of LIBELIUM COMUNICACIONES DISTRIBUIDAS S.L. ("LIBELIUM") is attributed with the responsibility, among others, of formulating a strategy supporting and approving the Criminal Risk Prevention Policy, as well as organizing internal control systems for this purpose. In the exercise of this responsibility, and in accordance with the culture of prevention of irregularities, Libelium dictates this Policy for the prevention of crime.

Libelium undertakes strict compliance with current legislation in the field of development of its activities and deems to fully respect the obligations and commitments assumed in its contractual relations with third parties, further, to know and comply with the laws and regulations that affect their respective areas of activity. Furthermore, to respect the general principles of risk management for crime prevention included in the Manual and compliance with the Code of Conduct approved by the company.

No Libelium employee will consciously collaborate with third parties in violation of any law, nor will they participate in actions that compromise respect for the principle of legality.

Libelium is committed to maintaining honest and upright behaviour in all its actions, avoiding all forms of corruption and respecting at all times the circumstances and particular needs of all the subjects involved in the Company's business and professional activities.

The members of the Libelium management body express their commitment to 'zero tolerance' in reference to criminal acts. In this context, they announce their firm opposition to the commission of any type of illegal or criminal activity and full commitment to deploying all means at their disposal for the detection, prevention and punishment of fraudulent acts and conduct that may be committed by their legal representatives. Said representatives are authorized to make decisions on behalf of the company or have organizational and control powers, of its employees, managers or any person subject to their authority. Above all, maintaining a business culture of honesty and ethics at all times.

As a sign of this firm commitment, the Crime Prevention Management System was established. The Crime Prevention Policy will be periodically reviewed and modifications and updates that contribute to its development and continuous improvement will be proposed, taking into account, where appropriate, the suggestions and proposals made by Libelium professionals or other interested parties.

This Crime Prevention Policy has been approved by the Board of Directors of LIBELIUM COMUNICACIONES DISTRIBUIDAS S.L on April 2019