

# **DISSEMINATION OF THE CRIMINAL RISK PREVENTION AND ANTI- BRIBERY PLAN TO THIRD PARTY STAKEHOLDERS**

20 DECEMBER 2022

## 1. INTRODUCTION

The Group makes available to third party stakeholders a summarised version of the Criminal Risk Prevention and Anti-Bribery Plan (hereinafter, the Plan) in place throughout Grupo Cooperativo Cajamar as well as the entities involved and linked to it (hereinafter, the Group). The Plan has been prepared in line with key legislation (Criminal Code) and best practices in the field of legal compliance (Standard UNE 19601, Standard ISO 37001 and the criteria of Circular 1/2016 issued by the State Attorney General's Office on the criminal liability of legal persons).

The purpose of the Plan is to provide the Group with a control system aimed at preventing the commission of crimes within the Group, by reviewing, analysing and monitoring activities and processes that are exposed to the risks of committing crimes; in such a way that it can be ensured, before third parties and before judicial and administrative bodies, that the Group entities effectively perform their duties of supervision, monitoring and control of their activity and, therefore, exercise over their directors, managers and employees the due control that is legally required of them.

In addition to the Bank, which is the head of GCC, the rest of the entities that make up GCC are classed as credit institutions. Therefore, they are under the supervision of different regulatory bodies, such as the Bank of Spain, European Central Bank, National Securities Market Commission, Directorate General of Insurance and Pension Funds or the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences, and they are subject to rigorous rules of conduct and organisation established by the regulations applicable to this type of entity. In this sense, Group entities have numerous procedures and controls in place, required both by their supervisors and by sector-specific regulations.

## 2. OBJECT

The Plan aims to promote a culture of compliance based on the principle of “zero tolerance” towards the commission of unlawful acts and fraud, establishing measures aimed at their prevention, detection and early management, promoting ethics and the responsible behaviour of all subjects, regardless of their hierarchical level.

## 3. SCOPE

The Plan is applicable and mandatory for all “entities bound by the plan”, referring to the credit institutions that make up Grupo Cooperativo Cajamar (financial group), the subsidiaries that are part of the Group’s consolidated accounting perimeter (non-financial group) and the foundations linked to the Group’s credit institutions, as well as the directors, representatives, senior management, employees and agents of the entities bound by the plan (hereinafter, we will refer to all these persons by the term “persons bound by the Plan”).

The scope of the Plan covers all activities carried out by the entities bound by the Plan. Consequently, it affects all kinds of activities, operations and services typical of the banking business in general, which comply with current legislation, including the provision of investment and ancillary services, under the terms established in

the securities market regulations, carried out directly by the credit institutions of Grupo Cooperativo Cajamar and/or by the subsidiaries of its non-financial group, as well as by the foundations linked to its credit institutions, all in accordance with the provisions of their corporate by-laws and applicable regulations.

The Group's other stockholdings and the suppliers or providers of professional services must expressly accept the Group's policies regarding suppliers, collaborators and subcontractors, as well as observe the principles of criminal risk management set out or declaring that they have a handbook or follow equivalent principles.

For the above purposes, "other stockholdings" refer to all entities in which BCC has a shareholding, but which do not belong to the Consolidated Group.

"Professional service providers" refer to (i) entities or persons to which functions specific to the activities of the Group entities are outsourced; (ii) entities or persons performing functions directly supervised or under the direct control of the Group entities; or (iii) entities or persons in respect of which one or more of the Group entities is their primary customer.

## 4. COMMITMENT TO COMPLIANCE

In order to verify the effectiveness of compliance with the rules and control procedures in place within the Group that minimise the risk of unlawful behaviour by the persons bound by the Plan, the following actions have been carried out:

- It has been established that all such persons must act in accordance with the Criminal Risk Prevention and Anti-Bribery Plan, the Code of Conduct and the Anti-Corruption Policy, which constitute the main normative instruments of our Criminal and Anti-Bribery Management System.
- The activities carried out by the Group in which criminal risks may arise are reviewed, establishing the list of offences for which criminal liability could be required.
- Supervision of the functioning of and compliance with the Group Plan is entrusted by the Board of Directors to the Risk Monitoring Committee, which is responsible for monitoring the Group's risks.
- There is a process for reporting possible breaches or violations, which allows the Group to know and react to possible unlawful situations, called the "Whistleblower Channel".
- There is a disciplinary system in the event of non-compliance with the Group's internal obligations and policies that may create a criminal risk.
- There is a training and awareness plan for persons bound by the Plan on criminal risks, which is reviewed annually.

#### **4.1. Board of Directors and Senior Management**

The Board of Directors of BCC, as the head of the Group, is responsible for adopting and implementing organisational and management models that include appropriate monitoring and control measures to prevent crimes or to significantly reduce the risk of their commission.

Both the Board of Directors and the members of BCC's Senior Management will be responsible for publicising the content of the Plan, as well as supervising its compliance, in each of their respective areas of action.

The Board of Directors and the Senior Management support the Risk Monitoring Committee, of which members of the Senior Management are part, in the fulfilment of their duties, and actively promote the culture of Criminal Compliance within the Group, ensuring that adequate resources are available to effectively implement the system and encouraging the use of procedures and channels for communication and/or reporting of potentially criminal conduct that may affect the Group and its activities, among other matters.

#### **4.2. Supervisory Body**

The Risk Monitoring Committee is the supervisory body for the prevention of criminal risks appointed by the Board of Directors, as it has autonomy and independence both in terms of controlling power and initiative.

It is responsible for implementing the Plan, and supervising and monitoring its functioning, with the support of the Control Division, and without prejudice to the responsibilities that correspond to other departments and bodies of the Group in matters of control.

#### **4.3. Control Division – Regulatory Compliance Department**

The review and achievement of compliance objectives is entrusted to the Regulatory Compliance Department, within the Control Division, which, in turn, reports directly to the Board of Directors and is endowed with the capacity, independence and authority to ensure the correct implementation and continuous improvement of our criminal compliance and anti-bribery system.

#### **4.4. Staff**

All staff members bound by the Plan have the obligation to comply with it, as well as to report any breaches of which they are aware or have well-founded suspicion, using the whistleblower channel and procedure made available on the website and intranet. In addition, they will ensure the prevention of unlawful criminal behaviour and follow the awareness and training actions run by the Group, regarding the importance of regulatory compliance and, in particular, on the prevention of criminal risks and bribery.

## 5. WHISTLEBLOWER CHANNEL

The Group has a whistleblower channel available to its members and third parties outside the Group, as a tool to prevent and detect possible actions that contravene our Code of Conduct, Criminal Risk Prevention and Anti-Bribery Plan, or any other applicable internal or external regulations.

Grupo Cooperativo Cajamar's whistleblower channels allows individuals to communicate reportable facts and events by any of the means indicated below. The informant may choose to remain anonymous if they wish, but regardless, all reports will be treated with the utmost discretion and confidentiality:

- By e-mail: [canaldenuncias@grupocooperativocajamar.es](mailto:canaldenuncias@grupocooperativocajamar.es)
- By post: Grupo Cooperativo Cajamar – Dirección de Auditoría Interna – Plaza 3 de Abril, nº 2 – 04006 Almería.

The Group guarantees that anyone who reports facts or actions to the channel in good faith will not be subject to any type of retaliation, nor will they suffer any other adverse consequences as a result of filing a report.