

This Anti-Corruption and Compliance Policy reinforces the commitment of the Governing Body of Navantia, S.A., S.M.E. ("Navantia") and its senior management to **linking up its ethical values and compliance with the legislation in force** in all the countries where it operates, with particular emphasis on the **commitment to pursue offences connected with corruption and to cooperate with the Law.**

This Anti-Corruption and Compliance Policy is applicable to all members of the organization and to third parties connected with Navantia, including those investee companies over which it has effective control, to which we convey a clear message of opposition to the commission of any unlawful criminal acts and Navantia's firm intention to combat and penalize them.

Navantia, in its effort to integrate this Anti-Corruption and Compliance Policy throughout its business activity and to improve the trust of its stakeholders, has implemented a Compliance Management System that ensures proper control of the Company's information and processes and which has been built on the following pillars:

- Development of a **business culture of ethics, honesty and transparency** aimed at strengthening good corporate governance and internal control practices.
- Implementation of a system for the identification, assessment and management of criminal risks, including those relating to potentially corrupt conduct.
- Putting in place protocols or procedures specifying the process of forming the legal entity's will to adopt decisions and executing them.
- The evaluation and management of financial and non-financial controls in place in Navantia.
- Ongoing training of employees and executives so that they understand the importance of Compliance in Navantia's business operations, so that they are able to identify and act correctly in the event of criminal risks, and so that they are familiar with the operational protocols in the event of detecting irregular conduct or the potential commission of a criminal offence.
- Implementation of internal due diligence procedures on members of the organisation as well as external procedures on business partners.

Navantia's Board of Directors has entrusted the supervision of the operation and observance of the Compliance System to the Compliance Committee, giving it autonomous powers of initiative and control.

In addition, as an indispensable part of the Compliance System, Navantia has a whistleblowing channel in place that is open to employees and third parties that are involved with the organization. If employees have knowledge, doubts or suspicions of any unlawful activity in the performance of their duties, they are obliged to report it immediately. No act of retaliation shall be tolerated against anyone who, in good faith, reports events that could constitute a breach of this policy.

In relation to the above, all those who breach these provisions shall be subject to the appropriate disciplinary measures, including dismissal in the case of employees, as well as other potential actions and/or legal penalties. Likewise, Navantia shall reserve the right to adopt any measures it deems appropriate against business partners who breach them.

The Navantia Compliance Committee shall regularly review the contents of the Anti-Corruption and Compliance Policy, ensuring that it sets out the international recommendations and best practices in force at any given time, and shall propose to the Board of Directors any modifications and updates that contribute to its advancement and continuous improvement.

This Policy was approved by the Board of Directos of Navantia S.A., S.M.E., on July 29th, 2020.