



ANTI-CORRUPTION PROCEDURE

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1. PURPOSE

The purpose of the present Policy is to regulate Navantia S.A., S.M.E.'s (hereinafter, "Navantia" or the "Company") actions regarding the commitment undertaken by the company in the Code of Conduct and to comply with the enforceable regulations in all countries where the Company operates, and in particular, to comply with anti-corruption laws and regulations in its dealings with other companies, with the government bodies and institutions of Spain, and third countries.

2. SCOPE

The present Policy shall apply to all employees and persons related to Navantia, as well as their legal representatives and de facto or de jure administrators (hereinafter, the "Employees"¹) in the activities they perform both in the country and abroad.

3. RESPONSIBILITY

Without prejudice to the liability set forth in the Navantia Code of Business Conduct:

- The **Compliance Committee** will oversee the functioning of the Compliance System in accordance with the provisions of the Compliance Committee Regulation.
- The **Department of Secretariat for the Board and Compliance** through the Compliance Division will provide counsel and solve any doubts regarding the content and application of the present Policy, will propose regulatory changes arising from ongoing improvement of legislative

¹ The term "**Employees**" is used in this Manual in an ample sense to refer to the set of people who may act under the authority of Navantia under the terms stated in Article 31 bis of the Penal Code, whether it is a labour and/or business relationship. The meaning of the term "**Employees**" may not be compared to other scopes outside this policy.

processes or changes, will carry out the due diligence of third parties with which Navantia maintains or foresees maintaining commercial relations, and it shall prepare and maintain a record of the legal audits performed on third parties related to Navantia. The information contained in those records will be made known to the Divisions or Departments involved, or that request such in exercise of their functions.

- The **Corporate Management Committee** shall not approve "Agency contracts or Lobbies," payments to said agents/lobbies, or agreements with business partners that are not accompanied by a report from the Compliance Division stating that the operation has been subject to sufficient levels of control.
- The **Department of Internal Auditing** will regularly check the level of compliance, scheduling audits to detect any non-compliance or deficiency, based on the company's risk assessment and available resources.
- The **Financial Management** has the legal obligation to draw up and maintain books, records and accounts that provide a reasonable detail, in a precise, fair way, of the transactions carried out by Navantia, it being forbidden to draft false documents or invoices, and it is likewise forbidden to perform entries in the wrong books which are ambiguous or deceitful, as well as to employ any other accounting procedure, technique, or instrument in order to conceal illegal payments.

Furthermore, before the Financial Management proceeds to pay any invoices for services provided by its agents, it shall request a control report on said agent from the Compliance Division.

- The **Department of Technology and Digital Transformation** (Procurement) shall include all the documentation required in this Procedure and shall inform the Compliance Division of the supplier's annual contracting volume, so that this information can be used to determine their level of risk.

Moreover, and in order to be able to correctly account for all the payments paid to Agents in the commission account of and independent mediator agent (6236), the Description of Technology and Digital Transformation (Procurement) shall evaluate the Agents, only in article group CC08. These may not be evaluated in another group of articles, except if specifically authorised by the Compliance Committee.

- The **Human Resources Division** shall take charge of all people within the scope of this Procedure are aware of it, informing them of the Anti-corruption and Compliance Policy of Navantia.

Likewise, the Human Resources Division shall prepare and maintain a record of all the due diligences performed on employees and managers. The information contained in these records shall be made known to the Divisions or Departments involved or who request this in fulfilment of their functions.

- **General Services** shall be responsible for the corporate level of management, storage and physical distribution of gifts, as long as authorised. General Services shall keep a record of the gifts made by Navantia, and shall draft an annual report at year-end date which shall include the number of gift requests received, the percentage of requests which were approved/refused, the decision criteria in force for the resolution of requests, etc. Likewise, special mention will be made of all requests that bear particular interest, whether it be due to the nature of the gift, the identity of the person receiving or offering it, or any other circumstances. This Report shall be submitted to the Compliance Division.

- The **Department of Legal Counsel and Affairs** will provide counsel and solve any doubts related to the contracts subscribed, or that are foreseen to be subscribed between Navantia and its commercial partners.
- The **Contracting Authority** shall not approve any orders from agents which are not accompanied by a report from the Compliance Division stating that the operation has been subject to sufficient levels of control.

4. ACRONYMS AND DEFINITIONS

For the purposes of this Procedure, the following expressions shall have the following meanings:

- **"Agent"**. - Natural person or legal entity that signs or may be appointed to sign a contract with Navantia to supply services as an agency, mediator, broker, or any other position of similar legal nature. Therefore, mediators, brokers, intermediary consultants or any name used to designate such positions fall under the term "Agent".
- **"Business ally"**. - Natural person or legal entity with which Navantia collaborates or wishes to collaborate, whether it be by incorporating a legal person, constituting an economic interest grouping or partnership, joint ventures, consortiums or any other form of business cooperation.
- **"Partnership"**. Legal person constituted by means of three or more natural or legal persons that are legally incorporated, who undertake to pool knowledge, resources and activities to achieve some common licit ends of general or specific interest.
- **"Agency Contracts"**. - This term includes mediation agreements, broker services contracts, or any other service contract of similar nature.
- **"Corruption"**. - Offering, promising, giving or accepting an undue advantage to a public official or an employee or representative of a private enterprise, directly or indirectly, in order to obtain or keep a business or other advantage (permits, inspections, legal proceedings, contracts...).
- **"Due diligence", "due control" or "Due Diligence"**. Set of actions aimed at reviewing the third parties with which Navantia it wishes to conduct or already conducts business (irrespective of whether they are representatives, agents, consultants, suppliers, other intermediaries, partners, contractors or subcontractors, distributors, etc.) prior to signing a contract and during time the contractual relationship is in force.
- **"Family members"**. - All persons of up to two degrees of kinship, whether by consanguinity or affinity, are considered family members, i.e.:

- Spouse or person with whom the person has a relationship of similar nature.
- Ascendants, descendants, and siblings, or brothers-and sisters-in-law.
- Spouses of ascendants, descendants, siblings, or brothers-and sisters-in-law.
- **"Public official"**. - This term usually includes any employee or officer of any government bodies, employee or officer of an SOE, employees and officers of international organizations such as the United Nations, politicians, candidates for public office, etc.
- **"Foundation"**. Organisation that, as wished by its creators, has allocated its assets to the achievement of general interest purposes and its beneficiaries are, according to its purposes, specific groups.
- **"Lobby"**. Is a natural or legal person with which Navantia commences or foresees undertaking legal relations so that, legitimately and to benefit its own interests, it may allow Navantia to be heard before the public administrations, warning of risks of a possible government decision, legislative amendment, or by proposing improvements to the juridical regulation.
- **"Navantia", "Firm" or "Company"**. Navantia, S.A., S.M.E.
- **"Hospitality Samples"**. These are all invitations and perks received or given by persons employed by Navantia, S.A., S.M.E. in order to represent the company before clients (current and potential), institutions, entities, and suppliers or establishing or improving the company's image. Restaurant expenses, attendance of events, and travel expenses (when the person receiving them is not in their own area) fall within this definition.
- **"Gifts" or "Company gifts"**. - Any goods or objects exchanged as a result of a business relationship in which the person receiving the gift does not pay the corresponding market price, and the person bestowing the gift does not expect anything in return. The nature of the gift is indifferent, and the person receiving it may be the person who it is presented to directly or their family members.
- **"Facilitation payments"**. - Refers to payments made to public officials to expedite the execution of routine or necessary actions. These payments aim to exert an influence on the speed with which an action is carried out by a public official, but not on the result thereof (e.g., payments to accelerate the issue of a visa, or the clearance of merchandise at customs).
- **"Sponsorship"**. - Sponsorship aims to endorse persons, companies, and non-profit organizations by providing support through financial means or in kind, with the aim of promoting or advertising Navantia.
- **"Bribe"**. - This is the most common form of corruption and can be defined as the act of giving, offering, promising, or receiving an undue advantage with the aim of exerting an influence on another person's behaviour to obtain or thus retain a trade advantage.

Bribery can take on many forms, offering, promising, or giving money or any other valuable goods to the person to be bribed or to a third-party related to the latter. In fact, even regular business practices or social activities (such as gifts or displays of hospitality) may be considered bribes under certain circumstances.

- **“Success fee”**. - Fees paid in exchange for results or commissions when previously defined goals have been obtained; these may be a fixed amount or a percentage applied to a previously defined amount (percentage of the total value of a transaction, for example). Also called a success fee.
- **“Competent immediate superior”**. - The members of the Corporate Management Committee or Business Directors within the scope of their competence.

5. DEVELOPMENT

5.1. REJECTION OF CORRUPT PRACTISES

Navantia expressly forbids any and all corrupt practices, in particular bribes, and forbids any undue or unlawful payments made by employees or representatives of Navantia to “Public Officials”, Directors, Managers and employees or collaborators of companies in order to secure preferential treatment when purchasing or selling goods or contracting professional services.

All business decisions involving Navantia must be based on merit.

Moreover, gifts and undue or unlawful payments offered or accepted by Navantia employees or representatives to or from any natural or legal person, with the aim of obtaining a certain degree of influence to obtain or retain business relationships in which Navantia, its employees, representatives or any other related parties partake, are prohibited.

No employee or representative of Navantia may promise, offer, pay, give, or obtain gifts and payments to or from third parties, whether in money or in kind, which pursue the following aims:

- Influence any action or decision.
- Expedite procedures regardless of whether these payments are lawful in accordance with local legislation or not.
- Induce a third party to act or refrain from acting in violation of their lawful duties.
- Ensure an undue advantage.
- Induce a third party to abuse their influence and affect the decisions of another agent in order for Navantia, its employees, representatives, or any other related parties to be awarded new business or to continue business with the company.

It is forbidden to make any corrupt payments through intermediaries and make a payment to a third party knowing that the full amount of a part thereof will go directly or indirectly to a public official. The term “knowingly” includes cases of conscious indifference and deliberate ignorance.

The following principles apply to payments for any supplier, agent, intermediary, or third party:

- The payment must be reasonable and rational for the services supplied.
- Those receiving the payments must have a strong and proven background in the corresponding sector.
- Suppliers, agents, and intermediaries must not be recommended or have been referred by public officials.
- The services supplied must be lawful, and both the nature of the services and the price therefor must be indicated in a contract or a purchase order, which will have been previously approved by the appropriate Contracting Authority.

On the basis of the abovementioned, and with the aim that Navantia’s employees or representatives have the confidence to act properly, it is guaranteed that any employee who refuses or declines to act in an unethical way, in accordance with the values and the Code of Business Conduct, will be protected and supported by the company under all circumstances.

■ 5.1.1. Excluded third parties

Business relations may not be established with natural and/or legal persons included in the official lists published by the European Union as suspected of engaging in money laundering or terrorist activities, or of being affiliated with terrorist groups.

■ 5.1.2. Third parties with greater than average risk

Business may be conducted with third parties with a greater than average risk where approval has been requested and granted by the Board of Directors.

The following circumstances are an indicator that a certain transaction poses such a risk:

- Natural and/or legal persons with a criminal record or linked to persons that have been banned from trading, or persons regarding whom information has been gathered that strongly indicates they may be linked to criminal activity, especially activities related or linked to corruption.

- Natural and/or legal persons who have submitted false or inaccurate data which employees have difficulty verifying at the start of the business relationship.
- Natural and/or legal persons who have been entrusted with a political function or are affiliated therewith (PEPs), especially if they hold or have held public office in non-democratic countries.
- Natural and/or legal persons who indicate the same registered address and telephone number as another with whom they have no apparent connection.
- Natural and/or legal persons who are residents or have their registered address in tax havens, in non-cooperative jurisdictions, or those without capacity to combat corruption, money laundering and terrorist financing, or in States considered “failed” or where it is known that criminal organizations are particularly active (for example, drug trafficking, terrorist activities, organized crime, and human trafficking).
- Natural and/or legal persons regarding which evidence, due grounds for suspicion of sentencing or infringements in matters of corruption, money laundering and terrorist financing are detected.

■ 5.1.3. Payments in tax havens

No payment may be issued to tax havens included in the list published by the Spanish Ministry of Finance (Royal Decree 1080/1991, of 5 July), unless there are legitimate grounds therefor and when said payments have been expressly approved by the Management Committee in a separate agreement to the contract giving rise to the payment obligation, whether it be an award, an extension or any other modification.

The procedure to approve said payments is as follows:

- The Department/s which have an interest in making a payment to a tax haven must previously obtain a report on the lawfulness of the transaction from the Department of Management and Finance (Tax Advice).
- After having examined the tax report, the Department/s which have an interest in making a payment to a tax haven shall draw up a brief stating the legitimate grounds for this payment. Both the tax report and the brief shall be submitted to Navantia’s Management Committee in order for its members to take the information contained therein into consideration before making a final decision regarding the payment, and the Compliance Division must be previously informed.

5.2. GENERAL DUE DILIGENCE FOR LEGAL RELATIONSHIPS WITH THIRD PARTIES

Navantia subjects all third parties with which it wishes to conduct or already conducts business (irrespective of whether they are representatives, agents, consultants, suppliers, other intermediaries, partners, contractors or subcontractors, distributors, etc.) to a legal review in order to assess the corruption risk prior to conducting business with said parties, and for the term in which any business agreements remain valid.

The due diligence process with respect to any parties affiliated with Navantia constitutes an important part of the prevention measures which companies can take in order to prevent reputational, operational, or legal risks.

Furthermore, the due diligence process is in all respects a necessity since, if omitted, crimes perpetrated by third parties while performing duties on behalf and for the benefit of Navantia may lead to Navantia being criminally liable for said crimes (Article 31 bis of the Spanish Penal Code), with the ensuing financial costs and reputational damage to the company. These risks for Navantia can be avoided/minimized by correctly performing the due diligence process.

Similarly, and while the contracts are in force, Navantia will continue to control any potential risks that could lead to Navantia becoming involved in corrupt practices, in order to, where applicable, terminate the contracts and/or take any other measures it deems necessary to safeguard the company's interests.

The legal review must follow the principles set forth in the present guidelines and in any other policies especially designed for specific business areas/risks. These reviews can be conducted by Navantia staff or by specialist companies or professionals.

With the aim of establishing the degree of due diligence necessary, the reputation of the country in which the contract services are to be provided with regards to corruption and money laundering shall be analysed; this also applies to end customers which are either public or private entities or bodies and, in the case of suppliers, the contracting volume.

Therefore, before Navantia establish the due diligence, the risk level indicators of the transaction must be analysed and classified into one of three levels: low, medium, and high.

- **Low risk.** - Any contracts entered into or business conducted where the end customer is a public institution of the European Union or in countries with a CPI score of 80 or above, or where the end customer is a private corporation with registered address within the European Union or in a country with a CPI score of 60 or above.
- **Medium risk.** - Any contracts entered into or business conducted where the end customer is a public institution in countries with a CPI score between 50 and 79, or where the end customer is a private corporation with registered address in a country with a CPI score between 40 and 59.

- **High risk.** - Any contracts entered into or business conducted where the end customer is a public institution in countries with a CPI score below 50, or where the end customer is a private corporation with registered address in a country with a CPI score below 40 or that are considered tax havens.

In order to aid with the risk assessment of a country in matters related to corruption and money laundering, the "List of tax havens included in Royal Decree 1080/1991, of 5 July", and the "Corruption Perception Index" (CPI) prepared by Transparency International, in force at any time, must be consulted.

Moreover, in assessing the country risk, the "annual fragile states index" by The Fund for Peace, in force from time to time, and if sanctions have been applied by international bodies.

Other factors, although not exclusively, which could be taken into consideration when assessing the risk posed by a third party are:

- Experience in the sector and their background/reputation in matters of corruption.
- The renown and reputation of the third party's integrity.
- Their trading history/previous trading experience with Navantia.
- The volume of the business transaction,
- Whether or not the third party will be in contact with public officials acting on behalf of Navantia.
- Whether an owner, shareholder, director, member of senior management, or partner of the third party may be considered a public official.
- Whether the third party is an established entity, and one with major clients, or if it is a recently formed company.

5.3. DUE DILIGENCE OF BUSINESS ALLIES

5.3.1. Due diligence prior to creating business alliances

Prior to entering into any contract and with the purpose of determining whether the candidates for business allies are known for corrupt practices, even in the event that the candidate has not yet been convicted therefor or if any of the candidate's key persons have been investigated, prosecuted for, convicted of, or terminated from office due to corruption, the Department/s with an interest in establishing the business alliance can take the following steps, depending on whether the business transactions are low-, medium-or high-risk:

5.3.1.1. Low-risk business transactions:

In the case of low-risk business transactions, the Department/s with an interest in entering into a legal relationship with a business ally must request the Compliance Division a due diligence report on that business ally, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the agent candidate to become a commercial ally.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the commercial ally.
- Report/File filled out and signed by the person responsible from the Management with an interest in the contract on the performance of the purpose of the contract by the commercial ally, which must mention incidents that have become known during negotiation of the contract.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the business ally candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the commercial ally.
- Report/File filled out and signed by the person responsible from the Management with an interest in the contract on the performance of the purpose of the contract by the commercial ally, which must mention incidents that have become known during negotiation of the contract.
- The risk analysis report, carried out by a specialist company or professional, that may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

5.3.1.2. Medium-risk business transactions

In the case of medium-risk business transactions, the Department/s with an interest in entering into a legal relationship with a business ally must request the Compliance Division a due diligence report on that business ally, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the agent candidate to become a commercial ally.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the commercial ally.
- Report/File filled out and signed by the person responsible from the Management with an interest in the contract on the performance of the purpose of the contract by the commercial ally, which must mention incidents that have become known during negotiation of the contract.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the business ally candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the commercial ally.
- A risk analysis report, carried out by a specialist company or professional, may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.
- Report/File filled out and signed by the person responsible from the Management with an interest in the contract on the performance of the purpose of the contract by the commercial ally, which must mention incidents that have become known during negotiation of the contract.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

5.3.1.3. High-risk business transactions

In the case of high-risk business transactions, the Department/s with an interest in entering into a legal relationship with a business ally must request the Compliance Division a due diligence report on that business ally, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the agent candidate to become a commercial ally.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the commercial ally.
- Report/File filled out and signed by the person responsible from the Management with an interest in the contract on the performance of the purpose of the contract by the commercial ally, which must mention incidents that have become known during negotiation of the contract.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the business ally candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the commercial ally.
- A "thorough" risk analysis report, carried out by a specialist company or professional, may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.
- Report/File filled out and signed by the person responsible from the Management with an interest in the contract on the performance of the purpose of the contract by the commercial ally, which must mention incidents that have become known during negotiation of the contract.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

After performance and approval of the due diligence report, the Compliance Division shall send it to the Department/s with an interest in establishing the business alliance, in order for it to submit it to Navantia's Management Committee, regardless of the relevant required documents, that shall take this into consideration when making its decision on the contract concerned.

The Compliance Division, as well as the Department/s with an interest in contracting similar services must retain the records of each legal review for a minimum period of fifteen years.

■ 5.3.2. Ongoing due diligence during the term of the legal relationship

Navantia engages an alert service from a specialist company to perform ongoing monitoring of Business Allies during the term of the legal relationship.

The Compliance Division will monitor the alerts and will keep a record of these for a minimum period of fifteen years, and it will inform the relevant Department/s of those that, even when not linked to matters related to corruption, it considers may be of interest to them, in order for them to proceed to take the appropriate actions.

The Compliance Division may draw up a report on monitoring of the relevant business ally at any time and at the request of the Department/s who wish such.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures during the contractual relationship may be taken.

5.4. DUE DILIGENCE OF THE AGENTS

5.4.1. Due diligence prior to hiring agents

Prior to commencement of a contractual relationship, and in order to know whether the candidate Agents are known for performing corrupt activities, even although not yet sentenced for such, or if any of their key persons are being investigated, or have been tried, sentenced or barred from exercising their profession for matters related to corruption, the Managements that wish to establish a corporate alliance must carry out the following actions, depending on whether this concerns low, medium or high risk commercial transactions:

5.4.1.1. Low-risk business transactions:

In the case of low-risk business transactions, the Department/s with an interest in contracting an Agent must request the Compliance Division a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the agent candidate.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the agent candidate.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract; any known issues with the contract and type of remuneration made known during the negotiation must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the agent candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the agent candidate.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract.
- The risk analysis report, carried out by a specialist company or professional, that may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

5.4.1.2. Medium-risk business transactions

In the case of medium-risk business transactions, the Department/s with an interest in contracting an Agent must request the Compliance Division a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the agent candidate.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the agent candidate.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the agent to perform the purpose of the contract; any known issues with the contract and type of remuneration made known during the negotiation must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the agent candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the agent candidate.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the agent to perform the purpose of the contract.
- The thorough risk analysis report, carried out by a specialist company or professional, that may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

5.4.1.3. High-risk business transactions:

In the case of high-risk business transactions, the Department/s with an interest in entering into a legal relationship with an agent must request the Compliance Division for a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the agent candidate.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the agent candidate.

- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the agent to perform the purpose of the contract; any known issues with the contract and type of remuneration made known during the negotiation must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the agent candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the agent candidate.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the agent to perform the purpose of the contract.
- A "thorough" risk analysis report, carried out by a specialist company or professional, may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

After performance and approval of the due diligence report, the Compliance Division shall send it to the Department/s with an interest in contracting the agent, in order for it to submit it to Navantia's Management Committee, regardless of the relevant required documents, that shall take this into consideration when making its decision on the contract concerned.

The Compliance Division, as well as the Department/s with an interest in contracting similar services must retain the records of each legal review for a minimum period of fifteen years.

■ 5.4.2. Due diligence of agents prior to the modification/renewal/extension of a valid contract

Prior to renewing the Agency Contracts and with the aim of complying with the obligation to monitor the Agent's conduct, the Department/s with an interest in renewing an individual contract must take the following steps in the due diligence process, depending on whether the business transaction is low-, medium-, or high-risk:

5.4.2.1. Low-and medium-risk business transactions:

In the case of low- or medium-risk business transactions, the Department/s with an interest in contracting an agent must request the Compliance Division a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the Agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.
- Report/File signed and filled out by the person in charge of the Department/s with an interest in renewing the Agent's service contract, indicating the Agent's contract performance; any compliance-related issues with the contract must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, completed and signed by the agent.
- The affidavit duly completed and signed by Navantia's employees who have actively taken part in managing the contract or who head up negotiations with the agent.
- Report/File signed and completed by the responsible Manager with interest in renewing the Agent, containing information about the Agent's performance in regard to the contract, specifically mentioning any contract incidents concerning compliance.
- Review of the information on the agent in the alert system.
- "Thorough" risk report by a specialist company or professional. This may be substituted by an anti-corruption certificate issued by a renowned international organisation.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

5.4.2.2. High-risk business transactions:

In the case of high-risk business transactions, the Department/s with an interest in renewing the Agent's service contract must request the Compliance Division a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.
- Report/File signed and filled out by the person in charge of the Department/s with an interest in renewing the Agent's service contract, indicating the Agent's contract performance; any compliance-related issues with the contract must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.
- Report/File signed and filled out by the person in charge of the Department/s with an interest in renewing the Agent's service contract, indicating the Agent's contract performance; any compliance-related issues with the contract must be mentioned.
- Review of information on the agent in the alert system.
- A "thorough" risk analysis report, carried out by a specialist company or professional, may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

After performance and approval of the due diligence report, the Compliance Division shall send it to the Department/s with an interest in renewing the agent's service contract, in order for it to submit it to Navantia's Management Committee, regardless of the relevant required documents, that shall take this into consideration when making its decision on the contract concerned.

The Compliance Division, as well as the Department/s with an interest in contracting similar services must retain the records of each legal review for a minimum period of fifteen years.

■ 5.4.3. Due diligence prior to success fee payments

Prior to the payment of any Success Fees, and in order to ensure compliance with the obligation to monitor the Agent's conduct in each given case, the following steps must be taken in the due diligence process, depending on whether the business transaction is low-, medium-, or high-risk:

5.4.3.1. Low-risk business transactions

In the case of low-risk business transactions, the Department/s in charge of the business transaction that resulted in a Contract award granting the right to receive Success Fees, must request the Compliance Division for a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract with the agent.
- Report/File signed and filled out by the person in charge of the Department/s where the item and amount due to be paid are established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.
- Bank certificate identifying the holder of the account to which the payment must be made.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the Agent candidate.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.
- Report/File signed and filled out by the person in charge of the Department/s where the item and amount due to be paid are established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.
- Bank certificate identifying the holder of the account to which the payment must be made.
- Review of information on the agent in the alert system.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

5.4.3.2. Medium-risk business transactions

In the case of medium-risk business transactions, the Department/s in charge of the business transaction that resulted in a Contract award granting the right to receive Success Fees, must request the Compliance Division for a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.

- Report/File signed and filled out by the person in charge of the Department/s where the item and amount due to be paid are established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.
- Bank certificate identifying the holder of the account to which the payment must be made.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.
- Report/File signed and filled out by the person in charge of the Department/s where the item and amount due to be paid are established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.
- Bank certificate identifying the holder of the account to which the payment must be made.
- Review of information on the agent in the alert system.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

5.4.3.3. High-risk business transactions

In the case of medium-risk business transactions, the Department/s in charge of the business transaction that resulted in a Contract award granting the right to receive Success Fees, must request the Compliance Division for a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.
- Bank certificate identifying the holder of the account to which the payment must be made.
- Report/File signed and filled out by the person in charge of the Department/s where the item and amount due to be paid are established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.
- Report/File signed and filled out by the person in charge of the Department/s where the item and amount due to be paid are established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.
- Bank certificate identifying the holder of the account to which the payment must be made.
- Review of information on the agent in the alert system.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken. After performance and approval of the due diligence report, the Compliance Division shall send it to the Department/s with an interest in and responsible for paying the agent.

In cases where the amount of the Success Fee exceeds €300,000, the Department/s in charge of managing the Agency Contract will draft a due diligence report, as well as other required documents, which must be submitted to Navantia's Management Committee, stating whether there are any actions which may indicate corruption or money laundering practices by the Agent in question.

The Compliance Division, as well as the Department/s with an interest in contracting similar services must retain the records of each legal review for a minimum period of fifteen years.

■ 5.4.4. Ongoing due diligence during the term of the legal relationship

Navantia engages an alert service from a specialist company to perform ongoing monitoring of Agents during the term of the legal relationship.

The Compliance Division will monitor the alerts and will keep a record of these for a minimum period of fifteen years, and it will inform the relevant Department/s of those that, even when not linked to matters related to corruption, it considers may be of interest to them, in order for them to proceed to take the appropriate actions.

Moreover, the Compliance Division may draw up a report on monitoring on the relevant Agent at any time and at the request of the Department/s who wish such.

5.5. SPECIAL DUE DILIGENCE PROCEDURE IN THE REPAIRS BUSINESS WHEN THE END CUSTOMER IS A PRIVATE CORPORATION

Given the particular aspects of the repairs business, and without prejudice to Navantia's obligation to carry out the due diligence process on Agents, Navantia has established a special due diligence process for this business which will be applied to all transactions where the end customer is a private corporation and none of the parties involved in the business (end customer, Agent) are residents of a tax haven.

5.5.1. Due diligence prior to entering into an agency contract

Prior to entering into any contract and with the purpose of determining whether the candidates for Agents are known for corrupt practices, even in the event that the candidate has not yet been convicted therefor or if any of the candidate's key persons have been investigated, prosecuted for, convicted of, or terminated from office due to corruption, the Department/s (or the Business managers, where applicable) with an interest in engaging the Agent's services must request the Compliance Division for a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the agent candidate.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the agent candidate.
- Report/File drafted by the Department in charge of the business transaction indicating the Agent's contract performance; any compliance-related issues with the contract must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the agent candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by the Navantia employees who lead the negotiation with the agent candidate.
- Report/File drafted by the Department in charge of the business transaction indicating the Agent's contract performance; any compliance-related issues with the contract must be mentioned.
- Review of the information on the agent in the alert system.

- In the case of high-risk agents, a risk analysis report, carried out by a specialist company or professional, that may be replaced by an Anti-Corruption Certificate issued by a renowned international organization will be required.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

After performance and approval of the due diligence report, the Compliance Division shall send it to the Department/s with an interest in establishing the business alliance, in order for it to submit it to Navantia's Management Committee, regardless of the relevant required documents, that shall take this into consideration when making its decision on the contract concerned.

■ 5.5.2. Due diligence prior to contract renewal

Prior to renewal of Agency Contracts and in order to comply with the obligation to monitor action by Agents, the Department/s with an interest in renewing each contract must request the Compliance Division to provide a due diligence report on that agent, before proceeding to pay Success Fees, and in order to ensure compliance with the obligation to monitor the Agent's conduct in each given case. The Department/s in charge of the business transaction that resulted in a Contract award, must request the Compliance Division for a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.
- Report/File drafted by the Department with an interest in renewing the Agent's service contract, indicating the Agent's contract performance; any compliance-related issues with the contract must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract, or who lead the negotiation with the agent.
- Review of information on the agent in the alert system.
- Report/File drafted by the Department with an interest in renewing the Agent's service contract, indicating the Agent's contract performance; any compliance-related issues with the contract must be mentioned.

- In the case of high-risk agents, a risk analysis report, carried out by a specialist company or professional, that may be replaced by an Anti-Corruption Certificate issued by a renowned international organization will be required.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

After performance and approval of the due diligence report, the Compliance Division shall send it to the Department/s with an interest in renewing the Agent's service contract, in order for it to submit it to Navantia's Management Committee, regardless of the relevant required documents, that shall take this into consideration when making its decision on the contract concerned.

The Compliance Division, as well as the Department/s with an interest in contracting similar services must retain the records of each legal review for a minimum period of fifteen years.

■ 5.5.3. Due diligence prior to success fee payments

Before proceeding to pay Success Fees, and in order to ensure compliance with the obligation to monitor the Agent's conduct in each given case. The Department/s in charge of the business transaction that resulted in a Contract award, must request the Compliance Division for a due diligence report on that agent, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the agent candidate.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract with the agent.
- Bank certificate identifying the holder of the account to which the payment must be made.
- Report/File signed and filled out by the person in charge of the Department/s where the item and amount due to be paid are established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence questionnaire filled out and signed by the agent.
- The affidavit filled out and signed by Navantia's employees who have participated actively in management of the contract with the agent.
- Review of information on the agent in the alert system.
- Report/File signed and filled out by the person in charge of the Department/s where the item and

amount due to be paid are established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.

- Bank certificate identifying the holder of the account to which the payment must be made.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

In cases where the amount of the Success Fee exceeds €300,000, the Department/s in charge of managing the Agency Contract will draft a due diligence report, as well as other required documents, which must be submitted to Navantia's Management Committee, stating whether there are any actions which may indicate corruption or money laundering practices by the Agent in question.

The Compliance Division, as well as the Department/s with an interest in contracting similar services must retain the records of each legal review for a minimum period of fifteen years.

■ 5.5.4. Ongoing due diligence during the term of the legal relationship

Navantia engages an alert service from a specialist company to perform ongoing monitoring of Agents during the term of the legal relationship.

The Compliance Division will monitor the alerts and will keep a record of these for a minimum period of fifteen years, and it will inform the relevant Department/s of those that, even when not linked to matters related to corruption, it considers may be of interest to them, in order for them to proceed to take the appropriate actions.

Moreover, the Compliance Division may draw up a report on monitoring on the relevant Agent at any time and at the request of the Department/s who wish such.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures during the contractual relationship may be taken.

■ 5.6. DUE DILIGENCE OF LOBBIES

Navantia, with the purpose of following the standards and recommendations of Transparency International and, due to the lack of regulation of the figure of the "lobbies", promises to establish an evaluation and a due diligence over them because it understands that they can operate in the market and are exposed to certain criminal risks that could affect the company both directly and indirectly.

■ 5.6.1. Due diligence prior to engaging the services of lobbies

Prior to entering into any contract and with the purpose of determining whether the candidates for lobbies are known for corrupt practices, even in the event that the candidate has not yet been convicted therefor or if any of the candidate's key persons have been investigated, prosecuted for, convicted of, or terminated from office due to corruption, the Department/s with an interest in contracting the lobby services must take the following steps, depending on whether the business transactions are low-, medium-or high-risk.

5.6.1.1. Low-risk business transactions

In the case of low-risk business transactions, the Department/s with an interest in contracting a Lobby must request the Compliance Division a due diligence report on that lobby, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the lobby candidate.
- The affidavit filled out and signed by Navantia's employees who lead the negotiation with the lobby candidate.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the lobby to perform the purpose of the contract; any compliance-related issues with the contract and type of remuneration must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the lobby candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by Navantia's employees who lead the negotiation with the lobby candidate.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the lobby to perform the purpose of the contract; any compliance-related issues with the contract and type of remuneration must be mentioned.
- Review of information on the lobby in the alert system.
- The risk analysis report, carried out by a specialist company or professional, that may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

5.6.1.2. Medium-risk business transactions

In the case of medium-risk business transactions, the Department/s with an interest in contracting a lobby must request the Compliance Division a due diligence report on that lobby, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the Lobby candidate.
- The affidavit filled out and signed by Navantia's employees who lead the negotiation with the lobby candidate.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the lobby to perform the purpose of the contract; any compliance-related issues with the contract and type of remuneration must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the lobby candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by Navantia's employees leading the negotiation with the lobby candidate.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the agent to perform the purpose of the contract; any compliance-related issues with the contract and type of remuneration must be mentioned.
- The risk analysis report, carried out by a specialist company or professional, that may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.
- Review of information on the lobby in the alert system.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken by the Compliance Division.

5.6.1.3. High-risk business transactions

In the case of high-risk business transactions, the Department/s with an interest in entering into a legal relationship with a lobby must request the Compliance Division a due diligence report on that lobby, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the lobby candidate.
- The affidavit filled out and signed by Navantia's employees.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the agent to perform the purpose of the contract; any compliance-related issues with the contract and type of remuneration must be mentioned.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the lobby candidate, sent by the Department/s with an interest in establishing a legal relationship.
- The affidavit filled out and signed by Navantia's employees.
- Report/File filled out and signed by the person in charge of the Department/s with an interest in the contract for the lobby to perform the purpose of the contract; any compliance-related issues with the contract and type of remuneration must be mentioned.
- A "thorough" risk analysis report, carried out by a specialist company or professional, may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.
- Review of information on the lobby in the alert system.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken by the Compliance Division, appraising the request for a legal report prepared by a law firm on compliance of the contract to be signed with the lobby with the local legislation.

After performance and approval of the due diligence report, the Compliance Division shall send it to the Department/s with an interest in contracting the agent, in order for it to submit it to Navantia's Management Committee, regardless of the relevant required documents, that shall take this into consideration when making its decision on the contract concerned.

The Compliance Division, as well as the Department/s with an interest in contracting similar services must retain the records of each legal review for a minimum period of fifteen years.

5.6.1.4. Ongoing due diligence during the term of the legal relationship

Navantia engages an alert service from a specialist company to perform ongoing monitoring of Lobbies during the term of the legal relationship.

The Compliance Division will monitor the alerts and will keep a record of these for a minimum period of fifteen years, and it will inform the relevant Department/s of those that, even when not linked to

matters related to corruption, it considers may be of interest to them, in order for them to proceed to take the appropriate actions.

Moreover, the Compliance Division may draw up a report on monitoring on the relevant Lobby at any time and at the request of the Department/s who wish such.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures during the contractual relationship may be taken.

5.7. DUE DILIGENCE OF SUPPLIERS

5.7.1. RISK LEVELS

In order to establish the level of due diligence required, the operation level indicators must first be analysed, and, for this purpose, the risk assessment of suppliers shall take into consideration the following:

- The contracting volume considered very low when supplier billing is below €300,000; low when supplier billing is between €300,001 and €1.000.000; medium when supplier billing lies between €1,000,001 and €12 million; and high when supplier billing exceeds €12 million.
- The reputation regarding corruption and money laundering of the country where the supplier has their registered address shall be analysed.

This makes it possible to divide the risks into four levels: very low, low, medium, and high:

- **VERY LOW RISK.** When a supplier has a very low volume of business with Navantia, this supplier is considered to pose a very low risk or no risk.

Additionally, those suppliers that are not directly related to the final customer shall be considered as having a very low risk.

As an exception to the general rule and due to the fact, the risk is very low or inexistent, it shall not be necessary to carry out due diligence before or during the duration of the contractual relationship.

- **LOW RISK.** When a supplier has a low volume of business with Navantia, this supplier is considered to pose a low risk.
- **MEDIUM RISK.** When a supplier has a medium volume of business with Navantia or has had a high volume of business, but the supplier is headquartered in an EU country or third countries with a CPI score of 50 or over, this supplier is considered to pose a medium risk.

- **HIGH RISK.** When a supplier has a high volume of business and is headquartered in a country outside the European Union with a CPI score of below 50 points, this supplier is considered to pose a high risk.

■ 5.7.2. Due diligence prior to supplier assessment

In the process of assessing a possible supplier and with a view to determining whether the Navantia supplier candidates are known for corrupt practices, even in the event that the candidate has not yet been convicted therefor or if any of the candidate's key persons have been investigated, prosecuted for, convicted of, or terminated from office due to corruption, the Department of Procurement must take the following steps, depending on whether the business transactions are low-, medium-, or high-risk:

The Technology and Digital Transformation Division (Procurement) must estimate the annual contracting volume to assign a risk level to the business transaction.

5.7.2.1. Low-and medium-risk business transactions

In the case of low-or medium-risk business transactions, the Technology and Digital Transformation Division (Procurement) must obtain and analyse:

- Navantia's due diligence form, filled out and signed by the supplier candidate.

Discretionally, and in light of the circumstances, other due diligence measures may be taken. In such cases, the Technology and Digital Transformation Division (Procurement) must inform the Compliance Division of the supplier's risk assessment, so that it can include the supplier in the list of companies to be monitored.

5.7.2.2. High-risk business transactions

In the case of high-risk business transactions, the Technology and Digital Transformation Division (Procurement) must request the Compliance Division a due diligence report on that supplier, for which they must gather and send that Division the following documents, so the following may be analysed:

- Navantia's due diligence form, filled out and signed by the supplier candidate.
- The affidavit filled out and signed by Navantia's employees who lead the negotiation with the supplier candidate.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the supplier candidate.
- The risk analysis report, carried out by a specialist company or professional, may be replaced by an Anti-Corruption Certificate issued by a renowned international organization.
- The affidavit filled out and signed by Navantia's employees who lead the negotiation with the supplier candidate.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

■ 5.7.3. Due diligence for assessment renewal

The Technology and Digital Transformation Division (Procurement) shall take the following steps biannually, depending on whether the business transaction is low-, medium-, or high-risk.

5.7.3.1. Low-risk business transactions

In the case of low-risk business transactions, Navantia's due diligence form, duly filled out and signed by the supplier, must be requested.

5.7.3.2. Medium-and high-risk business transactions

The Technology and Digital Transformation Division (Procurement) must obtain and analyse:

- In the case of medium-and high-risk business transactions, Navantia's due diligence form, duly filled out and signed by the supplier, must be requested.

- In high-risk transactions, Navantia's due diligence form, filled out and signed by Navantia's employees leading the negotiation with the supplier candidate, must be requested.

Furthermore, the Technology and Digital Transformation Division (Procurement) must request the Compliance Division a report on the follow-up of the alerts regarding the company or companies whose assessment is to be renewed.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

■ 5.7.4. Due diligence prior to commission or success fee payment

Before proceeding to pay Success Fees or commission, and in order to ensure compliance with the obligation to monitor the supplier's conduct. The Department/s in charge must request the Compliance Division to provide a due diligence report on that supplier, for which they must gather and send that Division the following documents, so they may be analysed:

- Navantia's due diligence form, filled out and signed by the supplier
- Report/File signed and filled out by the person in charge of the Department/s where the item and amount due to be paid are established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.
- Bank certificate identifying the holder of the account to which the payment must be made.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- Navantia's due diligence form, filled out and signed by the supplier.
- Report/File signed and filled out by the person in charge of the contracting Department/s where the item and amount due to be paid must be established. Moreover, should there be any compliance-related issues with the contract, these must be mentioned.
- Bank certificate identifying the holder of the account to which the payment must be made.
- Review of information on the supplier in the alert system.

Additionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

Payment of Success Fees to an amount of over €300,000 must be approved by the Management Committee. Following the analysis of all documentation contained in the due diligence file, the Department/s in charge of the business transaction will draft a brief/report which must be submitted to Navantia's Management Committee, stating the absence of actions which may indicate corruption or money laundering practices by the supplier.

If any indicators are uncovered that the Supplier is undertaking in corrupt or money laundering practices, the Department/s in charge will inform the Compliance Division and they will report this fact to the Compliance Committee, Navantia's Management Committee, or whoever it deems appropriate.

The Department/s responsible for the operation must retain the records of each legal review for a minimum period of fifteen years.

■ 5.7.5. Ongoing due diligence of a current business relationship between Navantia and a supplier

Navantia engages an alert service from a specialist company to perform ongoing monitoring of Suppliers during the term of the relationship.

The Compliance Division will monitor the alerts and will keep a record of each alert for a minimum period of fifteen years.

Furthermore, at the request of the Department of Technology and Digital Transformation Division (Procurement), the Compliance Division shall draft a report on monitoring the supplier or suppliers they wish for the requested period of time.

Discretionally, and in light of the circumstances surrounding the individual case, other due diligence measures may be taken.

■ 5.8. DUE DILIGENCE OF EMPLOYEES AND SENIOR MANAGEMENT

Navantia shall verify, before engaging the services of a new employee, of his/her appointment as a new member of the Management Committee, his/her granting of powers or appointment as advisor of a subsidiary or owned company, that the person being hired, appointed or granted powers has not been convicted for corruption charges in any procedure or investigation and in a final ruling, and that the person is committed and willing to comply with Navantia's Code of Business Conduct.

■ 5.8.1. Due diligence prior to hiring staff included within the scope of application of the Collective Bargaining Agreement of Navantia

In procedures to hire staff included within the scope of application of the Collective Bargaining Agreement of Navantia, the Human Resources Division must gather and analyse the following prior to their hiring:

- The honour form filled out and signed by the candidate to the post.
- Moreover, a criminal record certificate shall be requested for those classified in the following categories:
 - Personnel who are to be assigned to functional groups GP1 and GP2.
 - Personnel who are to provide services in the areas of Procurement, Financial, Human Resources or Sales within the different business divisions.

Furthermore, a clause must be included in the employment contract stating that, if the employee breaches the Navantia Code of Business Conduct, their functions may be changed, or their employment contract may even be terminated.

■ 5.8.2. Due diligence prior to hiring staff excluded from the scope of application of the Collective Bargaining Agreement of Navantia

In proceedings to hire staff excluded from the scope of application of the Collective Bargaining Agreement of Navantia, the Human Resources Division must request the Compliance Division to provide a due diligence report on the candidate, for which the following documents must be gathered and sent to that Division, so they may be analysed:

- The honour form filled out and signed by the candidate to the post.
- Criminal Record Certificate of the candidate to the post.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- The honour form filled out and signed by the candidate to the post.
- Criminal Record Certificate of the candidate to the post.
- Screening of the candidate in Compliance and trade matters.

Furthermore, a clause must be included in the employment contract stating that, if the employee breaches the Navantia Code of Business Conduct, their functions may be changed, or their employment contract may even be terminated.

■ 5.8.3. Due diligence prior to the promotion as personnel excluded from the scope of application of Navantia's Collective Bargaining Agreement

In promotion procedures involving Navantia's Collective Bargaining Agreement personnel to be excluded from the scope thereof, the Human Resources Division must apply to the Compliance Division for a "due diligence" report on the candidate, which will require compiling and referring the following documents to the Division for analysis:

- The honour form filled out and signed by the candidate for promotion.
- Criminal Record for the candidate for promotion.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- The honour form filled out and signed by the candidate for promotion.
- Criminal Record Certificate for the candidate for promotion.
- Screening of the candidate in Compliance and trade matters.

■ 5.8.4. Due diligence prior to appointing the managers of Joint ventures (JV) in which Navantia partakes

The Management responsible for the Joint Venture (JV) must apply to the Compliance Division for "Due Diligence" or "Due Control" report on the JV manager candidate, regardless of whether or not this person is a member of Navantia's workforce and subject the said report to approval by the relevant body.

The Compliance Division will prepare its due diligence report in accordance with the following documentation:

- The honour form filled out and signed by the JV manager candidate.
- Criminal Record Certificate of the JV manager candidate.
- Screening of the candidate in compliance and trade matters.

■ 5.8.5. Due diligence prior to the CEB approving the appointment of persons as directors of subsidiaries and owned companies

The Division to which the subsidiary or owned company of Navantia is assigned must request the Compliance Division to provide a due diligence report on the person proposed.

This report must be submitted to the CEB attached to the proposal for appointment.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- The honour form filled out and signed by the candidate to administrator of subsidiaries and owned companies.
- Criminal Record Certificate for the candidate to administrator of subsidiaries and owned companies.
- Screening of the candidate in Compliance and trade matters.

■ 5.8.6. Due diligence prior to powers being granted by the Board of Directors

The Department of Legal Counsel and Affairs must request the Compliance Division for a due diligence report on the person proposed to be granted powers.

This report must be submitted to the Board of Directors attached to the proposal for granting powers.

The Compliance Division shall prepare its due diligence report according to the following documentation:

- The honour form filled out and signed by the candidate to be granted powers.
- Criminal Record Certificate of the candidate to be granted powers.
- Screening of the candidate in Compliance and trade matters.

5.9. ASSOCIATIONS

Navantia is a member of associations, the object of which is to pool knowledge, resources and activities to achieve lawful, common goals of general or particular interest to Navantia.

5.9.1. DUE DILIGENCE PRIOR TO FORMING A PARTNERSHIP

In order for the Management Committee to properly assess the suitability of an association that Navantia wishes to form part of, the Department concerned must request the Compliance Division a due diligence report on the association, for which they will need to obtain and send the following documents to the Compliance Department:

- Report/Note to appraise the suitability of forming part of the association, as well as whether incidents in compliance matters are known
- Other documentation that the Compliance Division considers necessary.

The Compliance Division shall prepare its due diligence report according to the documentation submitted by the concerned Department and inclusion and review of the alert system that Navantia has contracted.

Without prejudice to the foregoing, the Compliance Division shall perform periodic monitoring of the alerts that arise, with regard to the associations that Navantia is a member of.

5.10. ACUERDOS DE COLABORACIÓN Y PATROCINIOS

Navantia supports non-profit organizations and events by establishing collaboration agreements and sponsorships.

Sponsorship aims to endorse persons, companies and non-profit organizations by providing support through financial means or in kind, with the aim of promoting or advertising Navantia.

The following criteria must be followed when Navantia makes collaboration agreements and sponsorships:

- Sponsorship and donations cannot be a cover to pursue or obtain aims which are unlawful for Navantia.
- All sponsorship and donations must be conducted with transparency and be properly documented.

- It is forbidden to make donations to political parties or affiliated organizations, to their representatives or candidates, whether in Spain or in foreign countries; political propaganda events cannot be sponsored.
- Payments cannot be deposited in accounts held by natural persons.
- Collaboration agreements and sponsorship cannot taint Navantia's image and must be aligned with company principles and values.
- All collaboration agreements and sponsorship must support a defined business aim.
- It must be ensured that the non-profit organization for which the sponsorship is intended is legitimate and not involved in any type of corrupt, criminal, or fraudulent activities, and that there are no conditions attached to the sponsorship related to receiving opportunities, business, or other benefits.
- The mission of the non-profit organization receiving the payment must be identified, as well as the purpose and use it will make of any resources granted.

■ 5.10.1. Due diligence prior to forming a non-profit partnership

In order for the Management Committee, or where applicable, another relevant body, to properly assess the suitability of being part of a non-profit organization, the Department with an interest must request the Compliance Division to provide a due diligence report on the non-profit organization, for which they must gather and send that Division the following documents:

- The Navantia due diligence form, duly filled out and signed by the non-profit organization.
- Report/Note to appraise the suitability of forming part of the non-profit organization, as well as whether incidents in compliance matters are known.
- Other documentation that the Compliance Division considers necessary.

The Compliance Division shall prepare its due diligence report according to the following documentation submitted by the interested Department and inclusion and review of the alert system that Navantia has contracted with regard to the non-profit organization.

Without prejudice to the foregoing, the Compliance Division shall perform periodic monitoring of the alerts that arise, with regard to the non-profit organizations during the time that Navantia holds relations with the non-profit organisation in question.

5.10.2. Control Due diligence prior to payment to the non-profit organizations according to a collaboration or sponsorship agreement

Prior to proceeding with a donation or sponsorship payment, and any sponsorship quotas to non-profit organisations for amounts of over €3,000, whether in a single payment or several payments spread out across the year, the Department must request a due diligence report from the Compliance Division on the non-profit organisation it intends to make payments to, which will require the following documents to be compiled and referred to the Compliance Division:

- The Navantia due diligence form, duly filled out and signed by the non-profit organization.
- A Report/Note prepared by the Department with an interest reporting its purpose, indicating that it carries no conditions related to receiving business opportunities and other benefits, as well as knowing incidents in Compliance matters.
- Other documentation that the Compliance Division considers necessary.

The Compliance Division shall prepare its due diligence report according to the following documentation submitted by the interested Department and review of the non-profit organisation in the alert system that Navantia has contracted.

5.11. GIFTS, PERKS, AND REPRESENTATION COSTS

Business courtesy, such as the granting of gifts and displays of hospitality, which is offered or received from customers, suppliers, and other partners, are common practice in the business world to improve business relationships and acknowledge professional treatment; a series of similar customs exist both in terms of the type and the value of the gifts granted or invitations extended, as well as similar exchange protocols.

However, in some countries it is forbidden to grant any kind of gifts or extend any kind of invitations, as these are seen as bribes. This is why no practices of business courtesy must be performed without previously having reviewed the anti-corruption legislation of the country in question or without having a thorough knowledge of local customs.

Navantia's Code of Business Conduct generally allows for corporate gifts and invitations to be extended, which are deemed merely as signs of business courtesy, when their value and frequency are reasonable. The code is flexible and can be adapted to the different circumstances present in other

parts of the world. However, the concepts on which it is based: “reasonable value” and “reasonable frequency” must be weighed against enforceable legislation in the countries where Navantia operates. Each one of these items in fact constitutes a limitation: corporate gifts must be infrequent samples of appreciation, not allowing any kind of gift or invitation to be made that could be interpreted as something that exceeds normal commercial practice or courtesy or, in any way, intended to receive a treatment of favour in performing any activity that may be linked to Navantia.

Navantia employees can therefore accept and grant gifts and special perks to suppliers, customers, or other business relationships, insofar as these gifts or invitations:

- Are not forbidden in local legislation or regional customs.
- Do not give the impression (or create an implicit obligation) that the person granting them will receive preferential treatment by being awarded more contracts, better prices, and more favourable conditions.
- Are not an embarrassment to Navantia or the company which employs the person who grants or receives the gifts if their existence were made public.
- Do not exceed the prices established herein or in other more stringent Navantia regulations; or
- If they exceed the established value, they must have been accepted on Navantia’s behalf and been handed over to General Services, with notification to the Compliance Division.

On the other hand, the following shall never be deemed appropriate:

- Granting gifts of money in cash or an equivalent (such as gift cards).
- Gifts which are forbidden by local legislation.
- Gifts intended as bribes, unlawful payments, or commission (for example, to obtain or retain contracts or to obtain undue advantages, such as preferential tax treatment).
- Gifts which the recipient knows are forbidden by the organization of the person granting them.
- Gifts granted in the form of services or other benefits which are not in the form of cash (for example, promise of employment).
- Any gifts granted while contract negotiations or the tender process are ongoing.

5.11.1. Gifts, perks, and representation costs received by employees of Navantia

Any gifts and perks received by a Navantia employee must be communicated to their Competent immediate superior in writing, with the Compliance Committee in copy so that it may be entered into an invitation and gift log. The gift or invitation must be described, along with the approximate price, the

name of the person, company, or organization which has extended the business courtesy, in addition to the business and relationship, unless it were:

- a meal and/or beverages consumed at a corporate marketing event
- corporate gifts with a maximum value of 40 euros.

The total value of all the gifts and invitations received by a Navantia employee from the same person, company, or organization, or those granted by Navantia to the employee of another company or organization with which Navantia has or wishes to build a business relationship, cannot exceed the value of €200 per year.

Were the €200 per year threshold exceeded, the Navantia employee must request authorization from their Competent immediate superior in order for the latter to determine whether the gifts and invitations should be declined. This authorization must be provided in writing and sent with a copy to the **Compliance Division** in order for it to keep a log of it.

Navantia considers any gifts or invitations received by the spouse/partner or family member of a person subject to this Policy as corporate gifts. Hence, these gifts are subject to this policy as are any other corporate gifts, and are therefore factored into the maximum amount of €200.

Any official gifts, prizes, awards, diplomas, etc. accepted by any Navantia representatives from the Central Offices must be deposited with **General Services**; the Department will then add them to a log/inventory and give instructions at all times of where they should be exhibited and/or deposited. The person receiving the items regulated in the present paragraph must report their origin when they are deposited with **General Services**.

In the case of official gifts, prizes, awards, diplomas, etc. accepted by any Navantia representative from the Business Units, these will be placed in the custody of the Unit's Senior Management, which will in turn notify **General Services** in order for the latter to enter them into the log/inventory. A photo shall be sent and indications will be provided as to where these elements have been deposited.

Lastly, all persons subject to the policy that, for any of the reasons described herein or in other more stringent Navantia policies, must decline a corporate gift will return said gift with a thank you note.

■ 5.11.2. Gifts, perks, and representation costs offered by employees of Navantia

Expenses resulting from invitations and perks for the purpose of representing Navantia before clients (current and potential), institutions, entities, and suppliers or establishing or improving Navantia's image are grouped under this heading. These include restaurant expenses, protocol events, travel expenses, event attendance, gifts, etc.

The expenses must be expressly authorized by a "Competent Hierarchical Superior" who must apply the most rigorous conditions when authorizing and paying expenses; these approvals and the process shall be subject to control by the authorized Departments and the Financial Division.

In the case of representation meals, the value cannot exceed a maximum amount of €85 per person within Spain, and €120 per person in the case of meals held in a foreign country. If, given the nature of the situation, a greater expense was necessary, this must be previously authorized by the Presidency and include a prior estimation and/or justification thereof. Special attention must be paid to ensure an adequate balance is maintained between the number of attendees on Navantia's behalf and the total number of attendees to these events.

Expenses resulting from representation and special attention to third parties must be requested, justified, and paid via the intranet application "Periscope" for this purpose.

Tips may not be included under any circumstances, unless these were mandatory.

Navantia has a catalogue of promotional and institutional gifts managed by **General Services**.

The promotional and/or institutional gifts, which the departments intend to give, shall be managed through the application "Periscope" and specifically authorized by the director of the Executive Board.

Gifts must be acquired by the Technology and Digital Transformation Division (Procurement) at the request of **General Services**.

General Services shall keep a record of the gifts made by Navantia, and shall draft an annual report at year-end date which shall include the number of gift requests received, the percentage of requests which were approved/refused, the decision criteria in force for the resolution of requests, etc. In addition, special mention will be made of those requests which, either because of the characteristics of the gift, or because of the identity of the recipient or issuer of the gift, or because of any other circumstances, are of special interest. This Report shall be submitted to the Compliance Division.

Travel and accommodation to external parties stemming from protocol events, representation or with business purposes must be specifically approved by a member of the CEB, previously informing the Compliance Division. Under no circumstances shall travel and accommodation costs for relatives or friends of these external persons be defrayed.

No employee can pay for any gifts, promotional gifts, and/or trips for a third party with a Navantia credit card, unless the Compliance Division has previously issued a favourable report and the Presidency has authorized said payment.

Any exception to the conditions established in this Policy, due to extraordinary circumstances, and insofar as they do not violate enforceable regulations, shall require the express authorization of the Presidency and a prior favourable report issued by Navantia's Compliance Division

5.12. VALIDITY OF THE DOCUMENTS

All the documents used to prepare the due diligence report must have a term under three months, except for the criminal record certificate that shall have an indefinite term, as long as there is no change in circumstances and the honour questionnaire must have a maximum term of 1 year.

5.13. ACCOUNTING REQUIREMENTS

Navantia is legally obligated to perform book-keeping activities, oversee all records and accounts, and ensure that they reflect with reasonable detail and precision all business transactions carried out by Navantia.

It is forbidden to draft false documents or invoices, and it is likewise forbidden to perform entries in the wrong books which are ambiguous or deceitful, as well as to employ any other accounting procedure, technique, or instrument in order to conceal illegal payments.

5.14. ANTI-CORRUPTION CLAUSES

The anti-corruption clause template or a similar clause which has been approved by the Department of Legal Counsel and Compliance Division must be included in all contract types references herein.

5.15. ADDITIONAL PROVISIONS

The Departments which are affected by this Policy may establish Procedures or Instructions to supplement the present policy which, without altering the provisions herein, further develop the procedure within the scope of their functions.

Prior to its approval, the drafts of the supplementary Procedures or Instructions mentioned in the previous paragraph of this Section must be submitted to the Compliance Division for a prior and binding report.

Should the Compliance Division's report be unfavourable regarding one of some of the measures undertaken in the drafts of the Procedures or Instructions these drafts may only receive approval if they incorporate the observations or recommendations issued by the Compliance Division.

5.16. SANCTIONS

Any breach of or non-compliance with this Policy will constitute an employment disciplinary issue, which will be sanctioned in accordance with the provisions of Navantia's Disciplinary Code, notwithstanding other liabilities the offender may have incurred.

6. REFERENCES

EXTERNAL STANDARDS

Organic Law 10/1995, of November 23	Spanish Criminal Code
UNE-ISO 37001:2017	Anti-bribery Management Systems. Requirements with guidance for use
UNE 19601:2017	Management System for Criminal Compliance. Requirements with guidance for use
PECAL 2110 Ed.4	NATO Quality Assurance Requirements for Design, Development and Production
ISO 9001:2015	Quality Management Systems. Requirements
ISO 14001:2015	Environmental Management Systems. Requirements with guidance for use
ISO 45001:2018	Occupational Health and Safety Management Systems
ISO/IEC 27001:2013	Information Security Management Systems. Requirements

NAVANTIA MANAGEMENT SYSTEM DOCUMENTS

N-CA-000.01	Navantia Code of Business Conduct
N-CA-000.05	Compliance Committee Regulations
N-001	Navantia Management System Standard
N-CA-003	Compliance Manual
P-CU-001	Conflict of Interest Management
P-CU-003	Crime Prevention
P-CU-004	Action and decision on infringement of the Compliance Management System
P-C-008	Context and Stakeholder Analysis

OTHER REFERENCE DOCUMENTS

	The Foreign Corrupt Practices Act of 1977 of the U.S.A.
	Bribery Act 2010 of The United Kingdom
	Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, of November 21, 1997
	BSI standards publication: specification for an anti-bribery management system (ABMS)
	OECD Best Practices Guidelines (Recommendation for Further Combating Bribery of Foreign Public Officials in International Business Transactions; Good Practice Guidance on Internal Controls, Ethics and Compliance).
	United Nations Convention and the Inter-American Convention against Corruption

7. PROCESS MAP, INDICATORS AND KPIS

The process map for risk and opportunity management is available on Navantia's Management System Portal.

8. ENTRY INTO FORCE

This Policy enters into force on the day following its publication.





Navantia