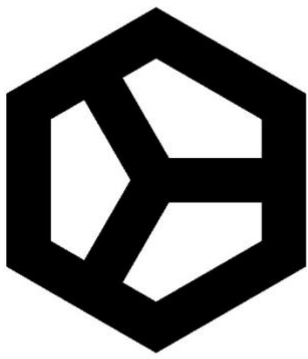




GENESAL
ENERGY

Anti-Corruption Policy

This document describes the objective, scope and general principles of Genesal Energy's anti-corruption policy.

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1 Corporate anti-corruption policy

1.1 Objective

GENESAL ENERGY offers innovative energy solutions in accordance with the applicable regulations, in a responsible, honest and ethical manner, for this reason we reject any form of corruption and bribery in any of its manifestations.

1.2 Scope of application

This code applies to members of the board of directors, managers, employees and any person acting on behalf of any of the companies that form part of the GENESAL ENERGY group (Genesal Energy Ib, Becover, Genesal Eng&Tech and all subsidiaries).

Likewise, it shall also extend to those persons who maintain a permanent working relationship with the organisation, who shall adhere to this policy because of the development of our activities.

This policy is in line with the company's Code of Ethics and complements our corporate policies.

1.3 General Principles

Corruption and fraud not only do not contribute to the economic development of a company but are also detrimental to social justice and the organised rule of law, which in turn can be detrimental to the economy and society. GENESAL ENERGY is committed to fighting any type of corruption and fraud in all aspects of our operations.

Basic principles have been established to act in a responsible and honest manner:

1. Reject any behaviour constituting corruption in any of its forms, including extortion and bribery, in the development of any business or professional activity carried out in the company, whether in the public or private sphere.
2. Promote a culture of prevention in matters of corruption, rejecting bribery and extortion practices, always in line with the provisions of our code of ethics.
3. Reject any kind of bribery of a public official or third party, relations must always be based on principles of integrity, transparency and honesty.
4. GENESAL ENERGY's partners will not participate in acts of corruption, therefore, we do not order or authorise corrupt practices, nor do we induce any person to carry out this type of practice outside or inside the company.
5. Establish in all our agreements and contracts anti-corruption clauses prohibiting illegal acts and practices. At the same time, we promote compliance with the law applicable to customers and suppliers, as well as to any strategic actor belonging to our value chain.
6. Ensure that no money, gifts, commissions, advantageous conditions or anything of value that may represent an advantage or benefit for an employee is received, paid, offered or authorised, either directly or indirectly, on behalf of GENESAL ENERGY.
7. No personal or GENESAL ENERGY donations are made to obtain business, gain an undue advantage or benefit for the company, any type of contribution must be made under the applicable laws and regulations, this will be subject to prior review by the company's legal advisor who will monitor compliance with the law.

8. If there are political contributions, these must be subject to review and approval by the company's legal department, in compliance with applicable regulations.
9. Identify and assess the risks associated with fraud and corruption in all its manifestations in the activities of the companies and their subsidiaries.
10. Establish adequate controls and preventive measures to identify, control, mitigate and prevent acts of fraud and corruption in all its manifestations, particularly in relations with third parties.
11. Where required, design specific procedures to prevent acts of corruption within the company.

1.4 Follow-up

The department responsible will oversee the implementation of this anticorruption policy in GENESAL ENERGY and its subsidiaries and will promote it with all customers and suppliers. In case an update is necessary, the corresponding modifications will be reviewed and submitted for approval by the board of directors.

1.5 Communication

GENESAL ENERGY undertakes to disseminate this policy to all employees of the organisation, its customers and suppliers. In the event of any type of complaint, irregular conduct or unlawful acts rejected in this policy, they may be communicated to genesal@genesal.com.

1.6 Approval and updating

In the exercise of its commitments and responsibilities, this policy has been updated by the board of directors of GENESAL ENERGY on the 7th of January 2025.