

ARESA SHIPYARD, S.L (hereinafter ARESA) is a company with a markedly international vocation, dedicated to the design, construction and marketing of boats made of composite materials, aluminium and steel at its facilities located in:

Moll del Portinyol s-n, 08350 Arenys de Mar, Barcelona

ARESA's Management has decided to implement an Anti-Bribery Management System (hereinafter referred to as the ABMS) based on the ISO 37001 Standard with the aim of preventing, detecting and sanctioning acts of bribery and corruption that may arise in the course of ARESA's business activities and from which they may derive, primarily in the following areas:

- Interactions with public officials during commercial activities related to bidding, tendering, and monitoring the progress of vessels under construction by ARESA personnel or its business partners (agents).
- Activities related to business partners (suppliers) by ARESA personnel in the decision-making and procurement processes for products and services, both for shipbuilding and for other resources necessary for carrying out the business (works, auxiliary services, etc.).

In this sense, any act of bribery and corruption is expressly prohibited, either directly or indirectly, by or for the benefit of ARESA employees, regardless of their contractual relationship, as well as by or for the benefit of private organisations, business associations, clients, suppliers, consultants, contractors or third parties that provide services under any type of contract.

In this line of ideas, without prejudice to the criminal rules on the matter, ARESA understands bribery as the direct or indirect act of giving, offering, promising, requesting or receiving material or immaterial goods, money, species, discounts or objects of value, whether as a donation, promise, gift, undue consideration or any other benefit or inappropriate advantage that aims to affect or influence the performance or decisions of any ARESA collaborator.

Any benefits provided or received by third parties must be justified by a genuine business purpose and must avoid the appearance of undue influence or corruption.

Therefore, ARESA is committed to:

1. Comply with the legal provisions in force and voluntarily assumed commitments related to the fight against bribery and corruption, as well as other ethical commitments set out in the ESMS.
2. To fight corruption in all its forms by approving, implementing and complying with internal management documents that minimise corruption risks among ARESA employees and third parties.
3. Appoint a compliance officer responsible for ensuring the effective implementation of the ESMS with authority and independence to perform his/her tasks and roles, reporting to management.
4. Act with impartiality, transparency and ethical behaviour in all activities carried out or executed, rejecting and reporting acts of corruption to the competent authorities.
5. To disseminate and train all ARESA employees and interested third parties in the provisions of the Anti-Bribery Policy and other documents of the ESMS.
6. To make available all necessary resources to carry out actions, measures and controls for the prevention and investigation of corrupt conduct.
7. Promote the raising of concerns in good faith or on the basis of reasonable belief, in confidence and without fear of retaliation.

8. Implement a whistleblowing channel (available on the website) that guarantees the confidentiality of reports or suspicions linked to acts of corruption and also protects the informant from any kind of threat, coercion or reprisal.
9. Establish objectives or mechanisms for continuous improvement of the ESMS.
10. Initiate investigations of ARESA employees and interested third parties who violate the Anti-Bribery Policy and other provisions of the ESMS or contractual clauses, as appropriate.
11. To subject the ESMS to periodic evaluations and reviews with the main objective of strengthening our corporate culture of transparency and integrity, guaranteeing the prevention, investigation, control and effective sanctioning of acts of corruption with the active participation of our employees and interested third parties.

Any breach of this policy will be considered a breach, subject to the imposition of disciplinary sanctions, in accordance with current labour legislation and collective bargaining agreements, without prejudice to reporting to the competent authorities any possible indications of criminal acts or breaches of which we become aware and claiming the appropriate compensation in the event that an action contrary to the Anti-Bribery Policy results in convictions, sanctions, financial losses or reputational damage.

Oriol López Querol

Director