



CRIMINAL COMPLIANCE POLICY

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1. VERSION CONTROL

VERSION CONTROL	
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Party responsible for approval	doValue Spain Board of Directors
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Version amendments	Comprehensive update of the Policy to align it with UNE 19601, adapt it to the Integrated Management System, revise the scope of application, update the governance of the criminal compliance system and adapt it to the Internal Information System Policy
Date of last update	31/07/2026

Version	Reason for change	Party responsible	Approval date	Ratification date
1.0	Initial version	Compliance Committee	18/09/2018	20/09/2018
2.0	Version 2	Compliance Committee	15/01/2019	16/01/2019
3.0	Changes introduced to the scope of application	Control Committee	07/10/2020	07/10/2020
4.0	Change of corporate name and update of new policies and procedures	Regulatory Compliance	26/04/2024	26/04/2024
5.0	Change in the reference to the Compliance Model to Compliance Framework and addition of a paragraph in section 5	Regulatory Compliance	10/03/2025	10/03/2025
6.0	Update and adaptation to the requirements of standard UNE 19601	Compliance Officer	31/07/2026	09/2026

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2. INTRODUCTION

Through this Criminal Compliance Policy, DOVALUE SPAIN SERVICING, S.A.U. (hereinafter, "doValue" or "DVSP" or "the Company" or "the organisation") and its subsidiaries express their commitment to developing a culture of compliance, integrity and business ethics that guides the conduct of all members of the Organisation and of those persons acting in its name or on its behalf.

Regulatory compliance and the prevention of criminal offences are essential elements of the Organisation's governance and control model. In this regard, doValue has implemented its own Integrated Management System (hereinafter, the IMS or the System), which incorporates the principles, controls and mechanisms necessary to prevent, detect and manage the criminal risks arising from its activities, in line with the legislation in force on the criminal liability of legal persons, as well as with the requirements of standard UNE 19601: Criminal Compliance Management Systems.

doValue's Senior Management and Board of Directors make an express commitment to promoting a culture of compliance based on respect for the law, zero tolerance of unlawful conduct and the continuous improvement of internal control systems.

doValue and its subsidiaries have achieved a position of leadership and benchmark status in the market. The ethical and responsible conduct of the members of the governing body, managers, employees, collaborators and other persons subject to this Policy (hereinafter, the "Personnel") has been and remains fundamental to this achievement, pursuing the implementation of a robust IMS and promoting a culture of compliance throughout the organisation. Accordingly, this Criminal Compliance Policy constitutes the reference framework of the System, which is known to and binding upon all Personnel and is driven by Senior Management.

3. SCOPE OF APPLICATION

This Policy applies to the members of the governing body, managers, employees, assigned workers, interns, trainees and, in general, to all persons carrying out their professional activity for doValue and its subsidiaries, irrespective of the nature, duration or form of their relationship with the Organisation.

This Policy likewise applies to those natural or legal persons acting in the name or on behalf of doValue and/or its subsidiaries, as well as to those exercising administration, management, supervision or control functions within the Organisation or the entities forming part of its group.

The Organisation shall also promote awareness and observance of the principles contained in this Policy among its business partners, suppliers, contractors, external collaborators, advisers and other third parties with which it maintains professional or commercial relationships, where applicable in accordance with the legislation in force, the contractual obligations assumed or the Organisation's internal control and compliance systems.

4. PURPOSE AND OBJECTIVES

The purpose of this Criminal Compliance Policy is to promote and consolidate a culture of compliance, integrity and ethical conduct within doValue and its subsidiaries, reinforcing the Organisation's commitment to the prevention, detection and management of the criminal risks arising from the conduct of its activity.

This Policy likewise expresses the commitment to zero tolerance of any unlawful conduct or conduct contrary to the applicable legislation, the Code of Ethics or the principles underpinning the Integrated Management System, and under no circumstances may the obtaining of any economic, operational or strategic benefit justify a regulatory breach.

In order to achieve that purpose, this Policy pursues the following objectives:

- To establish the general principles governing the Organisation's Integrated Criminal Compliance Management System.
- To foster diligent, honest and law-abiding professional conduct on the part of all persons subject to this Policy.
- To promote the prevention, early detection and appropriate management of criminal risks.
- To facilitate awareness of the obligations, responsibilities, controls and procedures that make up the Integrated Criminal Compliance Management System.
- To reinforce a culture of reporting and consultation in the event of doubts or possible breaches, encouraging the use of the channels made available by the Organisation.
- To contribute to the continuous improvement of the Integrated Criminal Compliance Management System and to the protection of the Organisation's reputation, sustainability and good governance.

5. GENERAL PRINCIPLES OF CONDUCT

The Integrated Management System of doValue and its subsidiaries is based on the following general principles, which constitute the fundamental basis both of the internal regulations of doValue and its subsidiaries and of the conduct of the Personnel:

- **Zero tolerance of the commission of criminal offences:** doValue and its subsidiaries prohibit all persons referred to in section 3 of this Policy from committing criminal acts and require them to report such acts, or any other suspicious conduct capable of constituting a criminal offence, through the channels established for these purposes.
- **Prevention and management of criminal risks:** To this end, and having regard to the nature of the activity of doValue and its subsidiaries —focused on the management and advisory of financial asset portfolios (including NPLs and REOs), credit recovery and management, and the management and marketing of real estate assets— the following are identified as areas requiring particular attention: the management of and negotiation with debtors and third parties in recovery processes; the contracting of and relationship with suppliers, intermediaries and business partners; the valuation, acquisition and transfer of

financial and real estate assets; and the management of confidential information and personal data. These activities are subject to periodic criminal risk analysis and assessment within the framework of the Integrated Management System, the results of which are set out in the corresponding criminal risk map. All of the foregoing is in accordance with the standards, principles, values and aims established in the field of criminal compliance and with the objective of minimising the exposure of doValue and its subsidiaries to criminal risks.

- **Commitment to legality:** doValue and its subsidiaries, and in particular their Board of Directors and Senior Management, undertake to comply with the applicable criminal legislation in force, as well as with the requirements established in the Integrated Criminal Compliance and Quality Management System. To that end, they shall act, and shall require that others act at all times, in accordance with the provisions of that legislation and of the System, and that the requirements of this Policy be complied with in all cases.
- **Duty to report:** doValue and its subsidiaries promote the duty to report, through the Internal Information System (IIS), any irregular conduct or potential breach of the applicable legislation or of the Organisation's internal regulations of which they become aware or reasonably suspect. The Organisation guarantees the confidentiality of reports, the protection of the reporting person's identity and the prohibition of retaliation or detrimental conduct on the terms provided for in the applicable legislation and in the Internal Information System Policy.
- **Disciplinary regime:** doValue and its subsidiaries disseminate among all Personnel the disciplinary regime applicable in the event of a breach of the Integrated Management System or of the applicable internal regulations, or in the event of the commission of acts or conduct that may be classified as criminal, pursuant to the provisions of the applicable collective bargaining agreements.
- **Framework for achieving objectives:** doValue and its subsidiaries establish, monitor and periodically review the objectives of the Integrated Criminal Compliance Management System, ensuring their alignment with the criminal risks identified and with the organisation's strategy. To that end, they allocate the financial, human and technological resources necessary for their proper achievement and monitoring.
- **Dissemination and access:** The System is disseminated properly and on an ongoing basis among all Personnel. Likewise, the principles and rules comprising it shall be available to all members of the organisation. This Policy is made available to all interested parties through internal communication channels and the corporate website.
- **Criminal Compliance Body:** The criminal compliance function, performed by the Compliance Officer, is responsible for supervising, managing and keeping the Integrated Management System up to date, ensuring its effectiveness. This function is carried out with autonomy and independence, and with full powers and authority to perform its role. The Compliance Officer reports directly to the Board of Directors, informing it periodically on the status of the System, and has direct access to it, irrespective of the reporting line, where circumstances so require. This reporting structure guarantees its functional independence from the business areas and from any body or person subject to its supervision.

- **Continuous improvement:** The Integrated Management System is subject to periodic review and continuous improvement, with recurring reporting to the Management Body and the Governing Body (Board of Directors) on its supervision and monitoring activities, on any structural and regulatory changes that may have occurred, and on criminal compliance performance measurements and the results of their assessment.

6. RULES THAT MAKE UP THE CRIMINAL COMPLIANCE FRAMEWORK

doValue and its subsidiaries have a series of fundamental rules, applicable to all Personnel, on which the Integrated Management System is structured and developed:

- **Code of Ethics:** constitutes the general reference and guidance framework for the conduct of the activities of doValue and its subsidiaries. Based on the business principles of doValue and its subsidiaries, it sets out the ethical principles that must govern the conduct of all employees. Knowledge of this document is mandatory for all members and external collaborators of doValue and its subsidiaries.
- **Integrated Management System Manual:** establishes the guidelines for action of doValue and its subsidiaries in order to exercise due control and the duty of oversight over their business activity, thereby complying with the legal requirements of the Spanish Criminal Code and with the risk control duties imposed by the Spanish Companies Act (Royal Legislative Decree 1/2010).
- **Internal Information System Policy:** doValue and its subsidiaries make available a Reporting Channel or Ethics Channel, where employees or third parties having a relationship with doValue and its subsidiaries may report breaches or suspicions of legal non-compliance within the business activity of doValue and its subsidiaries. This enhances transparency and oversight of proper compliance with the law and the Code of Ethics.
- **Corporate Procedure for the Management of the Internal Information System:** establishes the guidelines for action in cases where it is established that, within doValue and its subsidiaries, conduct is being carried out that may constitute breaches of European Union law, or serious or very serious criminal or administrative offences.
- **Global Conflicts of Interest and Related-Party Transactions Policy:** establishes the commitment of doValue and its subsidiaries to implement global measures and policies enabling the identification of potential conflicts of interest that may arise in the provision of services.
- **Gifts Policy:** establishes the express prohibition on giving or receiving any type of gift or financial commission with the intention of obtaining any kind of advantage benefiting the organisation.
- **Anti-Corruption Policy:** sets out the commitment of doValue and its subsidiaries to zero tolerance of any form of corruption, in both the public and private sectors, including bribery, kickbacks, influence peddling and any other corrupt practice.

- **Training on compliance and the prevention of criminal risks:** An annual training, communication, awareness-raising and dissemination plan is established, setting out the practical aspects of the prevention of criminal offences so that all members of doValue and its subsidiaries are aware of their rights and obligations in relation to criminal compliance.
- **Disciplinary regime:** which shall apply in the event of a breach of the Integrated Management System or of the applicable internal regulations, as well as in cases of the commission of irregular acts or conduct, in accordance with the regime of offences and penalties set out in the Collective Bargaining Agreements applicable to doValue and its subsidiaries, in the Workers' Statute and in any other applicable labour or internal rules. Where the acts may constitute a criminal offence, doValue and its subsidiaries may report them to the competent authorities, without prejudice to those cases in which such reporting is legally mandatory. The consequences of the disciplinary regime shall apply to all Personnel subject to this Policy, irrespective of their position or hierarchical level, including directors and senior managers, in accordance with the labour, commercial or contractual rules applicable in each case. All of the foregoing is without prejudice to the provisions of section 8 of this Policy.

7. COMMITMENT OF THE BOARD OF DIRECTORS AND SENIOR MANAGEMENT

The Boards of Directors and the Senior Management bodies of doValue and its subsidiaries reaffirm through this Policy their commitment to ethics, integrity, regulatory compliance and the prevention of criminal offences, promoting a culture of compliance that forms part of the Organisation's values and day-to-day activity.

The Board of Directors, as the Organisation's governing body, assumes visible, active and effective leadership in relation to the Integrated Criminal Compliance Management System, driving its implementation, supervising its operation and promoting its continuous improvement. It also approves this Policy and ensures that the System has the human, technological and financial resources necessary to achieve its objectives.

For its part, Senior Management is responsible for promoting the effective application of the principles and requirements established in the Integrated Management System, fostering conduct consistent with the culture of compliance and integrating criminal compliance objectives into the Organisation's day-to-day management.

The Board of Directors and Senior Management expressly support the independent exercise of the Criminal Compliance function, entrusted to the Compliance Officer, guaranteeing its autonomy, authority, access to the information necessary to perform its duties and direct access to the governing bodies where circumstances so require.

Both bodies likewise promote the communication, dissemination and awareness of this Policy, as well as of the other elements comprising the Integrated Criminal Compliance Management System, driving the training, sensitisation and awareness of all persons subject to it.

8. REPORTING OF IRREGULARITIES

All persons subject to this Policy are obliged to report any breach or reasonable suspicion of a breach of the applicable legislation, the Code of Ethics, this Policy or the other rules comprising the Integrated Management System of which they become aware in the course of their professional activities.

To this end, the Organisation has an Internal Information System (IIS) managed in accordance with the Internal Information System Policy and the Corporate Procedure for the Management of the Internal Information System, guaranteeing the confidentiality of the information reported, the protection of the reporting person's identity and the prohibition of retaliation on the terms provided for in the applicable legislation.

The Internal Information System is supervised by the Internal Information System Committee (IISC), appointed by the Board of Directors as the System Manager.

Reports may be made through the channels made available by the Organisation, which are accessible via the following links:

- doValue: <https://dovalue.whistlelink.com/report/>
- TEAM4: <https://team4.canalhelas.com/home>

All matters relating to the operation of the Internal Information System, the reporting methods, the safeguards applicable to reporting persons, persons concerned and related third parties, as well as the processing of the reports received, are governed by the Internal Information System Policy and the Procedure for the Management of the Internal Information System.

9. BREACHES OF THE CRIMINAL COMPLIANCE POLICY

Compliance with this Policy is the responsibility of all persons falling within its scope of application. Likewise, the Board of Directors, Senior Management and the persons exercising management or supervisory functions in the Organisation must actively promote awareness, application and compliance within their respective areas of responsibility.

Notwithstanding the foregoing, it is the responsibility of the Compliance Officer, in the exercise of the Criminal Compliance function, to supervise the proper implementation, maintenance and effectiveness of the Integrated Criminal Compliance Management System, and to report on its operation to the Organisation's governing and management bodies.

Failure to comply with the provisions of this Policy may give rise to the adoption of such disciplinary, contractual or legal measures as may be appropriate in each case, in accordance with the legislation in force, the applicable collective bargaining agreements, the Organisation's internal regulations and the contractual obligations assumed.

Such measures shall be applied having regard to the nature and seriousness of the acts, guaranteeing in all cases the rights of the persons concerned and respect for the legally established procedures.

10. PUBLICATION AND ENTRY INTO FORCE

This Policy forms part of doValue's Criminal Compliance Management System and constitutes documented information thereof. The Policy shall be subject to periodic review and continuous improvement in order to ensure that it remains appropriate to the applicable legislation, to the evolution of the Organisation's criminal risks, to any organisational changes that may occur and to the needs arising from the operation of the Integrated Management System.

This Policy shall also be made available to interested parties through doValue's corporate website, the websites of its subsidiaries and such other means as the Organisation considers appropriate to ensure its dissemination and accessibility.

This Policy shall enter into force at doValue and its subsidiaries on the date of its approval by the relevant competent body, and shall remain in force until it is replaced, amended or repealed by a new version.