I. Objective

The purpose of this Compliance Program (the "Program") is to ensure that all Directors, Employees, and Third Parties, as defined in the "Anti-Bribery Policy," strictly comply with all anti-bribery and anti-corruption treaties and laws, in the countries where RAGHSA operates as well as internationally, together with the Company's policies and procedures.

II. Scope

This Program applies to RAGHSA, its subsidiaries, affiliates, and/or companies under its control, its Directors, employees, and contracted third parties.

III. General

The principles and values of the Company include compliance with all laws applicable to the jurisdictions in which we operate, and it is expected that every individual conducting business on behalf of RAGHSA complies with such laws. Based on these principles, the Company, through its Compliance Management, has developed and implemented this Compliance Program to prevent the violation of any anti-bribery and anti-corruption law or treaty, whether national or international. The terms anti-bribery and anti-corruption are used interchangeably in this document.

All Directors, Employees, and Third Parties, regardless of their nationality or country of origin, are required and expected to strictly comply with the United States Foreign Corrupt Practices Act (FCPA) and with all other applicable anti-bribery and anti-corruption treaties.

In essence, no Director, Employee, or Third Party shall pay, offer, authorize, or promise to pay, directly or indirectly, any object or thing of value to a Government Official (as defined in the "Anti-Bribery Policy"), a political party, or a candidate for political office, for the purpose of inducing or influencing such person or entity to act in a way that would contribute to or assist the Company in obtaining or retaining a business operation or commercial activity; in conducting business with another person and/or entity; or in securing any improper advantage.

The following sections describe the main elements of the Compliance Program.

COMPLIANCE OFFICER & ETHICS COMMITTEE

a. Definitions

Ethics Committee – Responsible for supporting the activities of the Compliance Manager in the development, implementation, and enforcement of the Compliance Program, as well as applying its experience and knowledge of the Company to the different situations that may arise.

b. Members of the Ethics Committee

The Ethics Committee shall be composed of:

- General Manager
- Legal Director

- Compliance Manager

The Compliance Manager shall act as Secretary of the Ethics Committee.

c. Functions and Responsibilities

The **Compliance Officer** shall be responsible, among other duties, for:

- Overseeing the development, implementation, and administration of the Compliance Program;
- Monitoring all due diligence activities under anti-bribery and anti-corruption law;
- Acting as the main point of contact between Company personnel and the Ethics Committee, and between the Ethics Committee and the Company's Directors;
- Monitoring existing relationships with Agents, advisors, or other representatives of the Company, including their hiring and related contracts;
- Reviewing the suitability of all potential joint venture partners for compliance with anti-bribery laws;
- Responding to Employees' questions on any aspect of compliance.

The **Ethics Committee** shall be responsible, among other duties, for:

- Monitoring the Compliance Program and making necessary modifications when appropriate;
- Creating a system (Ethics Line) through which employees may report irregularities, anonymously if necessary;
- Making recommendations regarding the investigation of irregularities;
- Carrying out any other functions and responsibilities assigned by the Company's Directors.

d. Meetings

The Ethics Committee shall meet at the request of any of its members. Meetings, unless they require full confidentiality, may be documented in minutes including the issues discussed and decisions made..

EMPLOYEE EDUCATION PLAN

A key purpose of the Compliance Program is to promote the Company's ethical principles, uphold the highest professional and ethical standards, and ensure compliance with the law. The implementation of an Employee Education Plan (the "Plan") is an integral part of the Compliance Program.

a. **Responsibility for the Plan**

The Compliance Manager is responsible for implementing the Plan. The Plan is designed to provide an appropriate level of information and training to Company Employees regarding ethical principles and to raise awareness of the Program.

b. **Training and Educational Methods**

- The Company will hold training sessions ("Roadshows"), which shall be mandatory for Directors and/or Managers, all Employees performing administrative functions, and any other staff directly affected by anti-bribery compliance requirements.
- Roadshows will cover topics including: Code of Ethics, Ethics Line, Compliance Program, Anti-Bribery, summaries of current policies and procedures, practical case studies, among others.
- Training methodologies may also include: specific and/or individual training sessions or talks, communications/instructions via email or intranet, among others.
- The Compliance Manager may recommend that certain employees attend publicly available seminars or courses covering specific aspects of the law.
- The Company's induction course for new employees will include an explanation of the Program, including dissemination of the Code of Ethics and Ethics Line, while emphasizing the importance of maintaining a high standard of conduct and ethical behavior.

ETHICS LINE & EMPLOYEE REPORTING

The Company will establish a system ("Ethics Line") through which employees may report workplace irregularities without fear of retaliation, guaranteeing confidentiality and anonymity.

a. **Specific Responsibilities of Employees**

- **Duty to Report** – Employees are expected to immediately report any suspected or actual irregularity (whether or not based on personal knowledge) concerning anti-bribery law and/or Company policies, to their supervisor, the Compliance Officer, or another member of the Ethics Committee. Suspected or actual irregularities may also be reported through the Company's confidential and anonymous Ethics Line, the details of which are available on the Company's intranet.

- **Acknowledgment of Receipt** – Upon receiving relevant documents such as the Code of Ethics and Ethics Line, Employees will be provided with a document outlining the main features and guidelines, as well as their adherence to them. This acknowledgment will be signed by the Employee and filed in their personal records.

b. **Specific Corporate Responsibilities**
Upon receiving a report of a suspected or actual irregularity, the Ethics Committee shall:

- Apply the current Ethics Line Protocol;

- Document and investigate the report, either internally or by hiring specialists;

- If an irregularity is identified, determine immediate measures to mitigate it.

VII. DUE DILLIGENCE

The Compliance Program adopts the following guidelines, to be conducted on a recurring basis, regarding the review and validation of:

a. Agents, Advisors, Representatives, and/or Partners

- **Due Diligence Questionnaire** – Requesting information such as: ownership and organizational structure; relationships or interactions with government entities or officials; prior involvement in any non-routine government inquiry; familiarity with anti-bribery law requirements; fee structure, among others.
- **Reference Checks** – References may be requested to verify professional reputation, ability to comply with corporate procedures and anti-bribery laws, fee structure, ability to accept corporate oversight of their activities, or any other areas of concern.
- **Contract Review** – Reviewing drafted or proposed contracts, with particular attention to red flags or potential issues, especially fee structures (commissions, fund requests, financial agreements), the responsibilities the third party proposes to assume, and whether the contract contains a provision committing to compliance with anti-bribery law requirements.
- **Documentation** – Each step of the due diligence process shall be documented.

b. **Transactions Subject to Review**

- Compliance measures require all Employees to inform the Compliance Officer of any bribery request or suspicious situation.
- Guidelines regarding the application of anti-bribery laws are described in the Anti-Bribery Policy.
- Guidelines applicable to gifts, sponsorships, donations, and contributions are set forth in the Gifts, Sponsorships, Donations and Contributions Policy.

MONITORING & INTERNAL CONTROL

Compliance with all internal controls of the Company is a process that must be performed and monitored continuously. All accounting records, vouchers, business gifts, donations, and any other business records must be reported and accurately recorded.

a. **Compliance Evaluation**

- **Applicable Laws** – The Legal Department and Compliance Management will determine appropriate actions in the event of non-compliance with applicable laws by any Employee.
- **Compliance Program** – The collaboration and adherence of all Employees to the implementation of the Compliance Program and to each of its elements is expected.

b. **Monitoring Procedures**

Reviews of irregularities suspected of violating the Program, the Company's policies and procedures, anti-bribery law, or any applicable law or Company policy, shall be overseen by the Ethics Committee and jointly directed by the Legal Director and Compliance Management.

IX. RESPONSABILITY

The Company's Compliance Manager and Ethics Committee are authorized to modify and update the Compliance Program, as necessary, to maintain compliance with all applicable laws and treaties..

REFERENCIES

Code of Ethics
Ethics Line Protocol
Anti-Bribery and Corruption Policy
Gifts, Sponsorships, Donations and Contributions Policy