

DESARROLLO MULTILATERAL S.L. is a company whose purpose is to "design and provide consulting and training services in the identification, formulation, implementation, administration, monitoring and evaluation of national and international technical assistance programmes and projects" and has established the following strategic objectives:

1. To ensure that the final products are technically rigorous and capable of exceeding the most demanding expectations of our clients:
 - a. By conducting a careful analysis of the results obtained by our experts.
 - b. Complying with applicable requirements and continuously improving its management system in an effective manner.
 - c. Taking into account the needs and expectations of customers and all relevant stakeholders, as well as the legal and regulatory requirements applicable to its products and services.
 - d. Complying with the requirements established in the UNE-EN-ISO 9001:2015 Integrated Quality Systems standard

2. Advocating for the protection and conservation of the environment by focusing the organisation's activities on:
 - a) Compliance with current environmental legislation and regulations and other requirements to which the company subscribes.
 - b) Always acting with effective control of the environmental impact of its facilities, processes, products or services.
 - c) Acquiring a commitment to environmental protection, including pollution prevention, thus directing its efforts towards greater environmental compatibility in all its processes.
 - d) Compliance with the requirements established in the UNE-EN-ISO 14001:2015 standard - Environmental management system.

3. Maintaining a culture of compliance within the organisation that prohibits any attempt or act of bribery, in accordance with current legislation on integrity and the fight against corruption and bribery; to this end:

- a) You agree to comply with the Code of Ethics and Code of Conduct.
- b) Strictly comply with current legislation on anti-bribery, prevention and the fight against corruption.
- c) Appoint an Internal Information System Manager (RSII), in accordance with Law 2/2023. This person is legally responsible for managing and processing complaints in accordance with the requirements and guarantees established in current regulations, ensuring the protection of the whistleblower, confidentiality and diligence in the procedure.
- d) Provide the framework for preventing, identifying and addressing bribery that the organisation may face and the effectiveness of the Anti-Bribery Management System (ABMS).
- e) Promote the raising of concerns in good faith, or on the basis of reasonable belief, in confidence and without fear of reprisal, both by persons belonging to the organisation and by third parties with sufficient grounds.
- f) Ensure an Anti-Bribery Compliance Function (FCA) that, in addition to collaborating in the design and ensuring the implementation of the anti-bribery management system, provides advice and guidance to all staff in the organisation on any matter related to the system itself, ensuring that it complies with the requirements of the UNE-EN-ISO 37001:2025 standard and reporting on its performance to the competent bodies, all from a position of complete independence from this Anti-Bribery Compliance Function, which will be responsible for ensuring the effective implementation of the ABMS, with the autonomy and authority to carry out the aforementioned tasks and responsibilities.
- g) Ensure the existence and communication of a specific disciplinary regime, which will be implemented in the cases provided for and in the event of non-compliance with the policy and/or management system.



**Annex I:
INTEGRATED
MANAGEMENT SYSTEM**

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The following tools are shared in each area of the integrated management system:

- a)** Establishing the foundations and ensuring a commitment to continuous improvement of the anti-bribery management system within the organisation.
- b)** Raising awareness and training staff on technical issues related to continuous improvement, environmental awareness and the prevention of corrupt practices.
- c)** Establishing annual objectives through the implementation of a methodology for the ongoing evaluation of the objectives set.
- d)** Periodically reviewing the integrated management system to achieve greater efficiency in its implementation.
- e)** Providing the necessary resources for the maintenance of the integrated management system.

All employees of DESARROLLO MULTILATERAL S.L. are urged to support and comply with the criteria of this policy and to carry out their work in such a way that the improvement objectives established in accordance with it can be achieved.

Finally, we undertake to communicate and make this policy available to all interested parties, both internal and external.

Date 26/09/2025

Revision 3

General Management