

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

The Management of ARESA has decided to implement an Anti-Bribery Management System (hereinafter, 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 performance by ARESA of its activities and which may arise mainly in the following areas:

- Interactions with government officials during the commercial activities of bidding, tendering and monitoring the progress of vessels under construction by ARESA staff or its business partners (agents).
- Activities related to business partners (suppliers) by ARESA staff in the decision and procurement processes of products and services for both shipbuilding and non-shipbuilding.

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 the authority and independence to identify, analyse risks, propose controls, initiate investigations and submit recommendations to management, which also assumes the functions of the governing body. To this end, it has placed it at the highest level in the organisation chart and allocates it an annual budget item adjusted to its needs.
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.

In accordance with the provisions of this Anti-Bribery Policy and other ESMS documentation, all affected parties, regardless of their hierarchical level and geographical or functional location, are obliged to comply with the principles and procedures established in these texts, insofar as they are applicable to them. Likewise, in order to ensure the correct development of the SGAS, the Management urges them to report any contravention of the same through the complaints channel available on the website.

In the event that non-compliance is demonstrated, the Management, together with the Compliance Officer, will establish the corrective measures to be adopted, which are considered proportional to the risk or damage caused. Said measures shall not only apply to the individuals whose conduct has caused the risk or damage, but also to any employee who has not followed the procedures established by the Organisation for prevention and response, a circumstance that shall be considered in itself a breach of the values and principles to which ARESA is committed.

In addition, any breach of this policy shall be considered an infraction, subject to the imposition of disciplinary sanctions, by virtue of the labour legislation and collective bargaining agreement in force.

In the event that it is confirmed that the actions of any member of the Organisation could constitute a criminal offence attributable to the legal entity, this circumstance may be reported to the competent Public Authorities for their knowledge and prosecution. Such notification shall be accompanied by the evidence and/or indications that may have been gathered in this respect.

Oriol López Querol

Director