

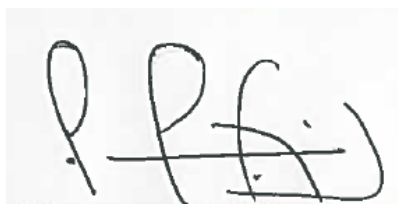
**POLICY FOR THE PREVENTION OF CORRUPTION,
ASSET LAUNDERING AND OR FINANCING OF TERRORISM**

STRACON is committed to maintaining the highest standards of integrity, ethics, and good corporate governance, therefore it rejects any act of corruption, asset laundering and or financing of terrorism.

In this respect, STRACON is committed to the following guidelines in order to prevent any act of corruption, asset laundering and or financing of terrorism:

- “Zero Tolerance” towards any act of bribery, corruption, asset laundering and or financing of terrorism.
- Providing annual training to employees regarding the measures adopted by STRACON to prevent any act of corruption, asset laundering and or financing of terrorism.
- Compliance with the applicable legislation related to anticorruption, prevention of asset laundering and or financing of terrorism in the jurisdictions where STRACON operates.
- STRACON's records must be accurate.
- Undertaking due diligence when contracting third-parties who act on behalf of STRACON, its providers and or employees.
- Undertaking due diligence when evaluating clients and partners, in order to prevent the receipt of funds from illicit activities.
- Requiring employees to report any case of bribery or blackmail.
- Under no circumstance should employees, directors and shareholders put their personal interests before those of STRACON.
- Disciplining employees for any breach of our Code of Ethics and the Manual for the Prevention of Corruption, Asset Laundering and or Financing of Terrorism, which could lead to the termination of the employment of those responsible.

Our Code of Ethics and the Manual for the Prevention of Corruption, Asset Laundering and or Financing of Terrorism complements this Policy.



John Tamayo Ortega
Chief Executive Officer

Date: 26/11/2021