

Criminal risk prevention policy

sipay

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1. SCOPE OF APPLICATION

The provisions of this Criminal Risk Prevention Policy are applicable to all members of SIPAY PLUS S.L., NEVADO VIÑARAS S.L., WOONIVERS SPAIN S.L., UINKU PAYMENTS S.L. and VIVO SERVICIOS DE COMPRA S.L. (hereinafter, SIPAY GROUP, or SIPAY or the Entity).

For these purposes, "members" are considered to be the sole Administrator; the DirectorateGeneral; to the heads of departments, to the staff who provide their services in the name and on behalf of SIPAY, regardless of the modality or duration of their contract; Advisors; lawyers, and consultants.

SIPAY will promote the application of the provisions of this Policy, to the extent applicable, to its customers; Suppliers; service providers and other third parties with whom it relates in the exercise of its activity.

2. COMMITMENT OF THE BOARD OF DIRECTORS

The sole administrator of SIPAY is responsible, among other things, for formulating the strategy and approving the company's Criminal Risk Prevention Policy, as well as for organizing the internal management systems in order to maintain rigorous control of compliance with current regulations, SIPAY's ethical principles and SIPAY's internal regulations.

That is why, in the exercise of this responsibility, and in accordance with the corporate culture of risk prevention, through this Policy, the Board of Directors shows the firm commitment of SIPAY and all its members to:

- To know and strictly comply with the legislation in force in the scope of the company's activity, as well as to fully respect the obligations and commitments assumed in its contractual relations with third parties.
- To provide all the necessary means and resources to promote, where appropriate, the prevention, control, detection and punishment of illegal or unethical acts and conducts that may be committed within the company.
- Respect the general principles for the prevention of crimes set out in the Criminal Risk Management System Manual and compliance with the Code of Conduct; as well as the rest of the internal regulations and risk controls established in SIPAY.
- Maintain an honest and upright behavior in all their actions and, therefore, oppose any form of criminal or any other type of offense.
- Avoid all forms of corruption and respect at all times the particular circumstances and needs of all subjects involved in the business and professional activities of the company.

This commitment **to zero tolerance and opposition to the commission of any kind of illegal act**, and to maintain at all times **a business culture of honesty, integrity and ethics** is promoted by the Board of Directors and by the General Management of SIPAY, and must be fulfilled by all members of the company and its stakeholders.

Consequently, strict compliance with the law, this Policy, the Code of Conduct, as well as the rest of the internal regulations and the **Criminal Risk Management System** (hereinafter, SGRP or Compliance), is mandatory for all SIPAY members; in such a way that the appropriate disciplinary measures will be adopted, case by case. to sanction any non-compliance in this regard.

As a sign of this firm commitment, SIPAY has set up a Compliance System and appointed a **Compliance Committee**, with autonomous powers of initiative and control, in charge of the development, supervision and monitoring of the SGRP; having been endowed with the resources, independence and authority necessary for the development of its functions.

In addition, SIPAY has an anonymous and totally confidential **Whistleblowing Channel** that is made available to all SIPAY members and interested third parties, so that they can report any suspicion or knowledge of actions or omissions that constitute infringements of European Union law, or that may constitute a serious or very serious criminal or administrative offence. specifically, those that may imply an economic loss for the Public Treasury and Social Security; as well as conduct contrary to this Policy, the Code of Conduct and the rest of SIPAY's internal regulations.

3. APPROVAL, VALIDITY AND REVIEW

This Criminal Risk Prevention Policy has been approved by the Sole Administrator of SIPAY and has an indefinite duration.

The Compliance Committee will periodically review this Criminal Risk Prevention Policy and will propose to the Sole Administrator the modifications and updates that contribute to its development and continuous improvement, taking into account, where appropriate, the suggestions and proposals made by SIPAY members or other interested parties.