



CRITICAL GROUP ANTI-CORRUPTION POLICY

With the aim of strengthening and complementing the principles of the Code of Conduct, this Policy reinforces the Company's culture and reaffirms the commitment to integrity, legality, and transparency, as well as to the highest standards of conduct. Any violation of anti-corruption legislation is not tolerated.

At Critical Software the fight against corruption is of great importance to the success and integrity of our businesses and ultimately our organization. It is essential for Critical that businesses follow strong anti-corruption policies and programs to prevent and detect corrupt practices.

This policy aims to establish guidelines and procedures that promote a culture of transparency, integrity, and ethical behavior within the organization.

To effectively enforce the guidelines and procedures of this policy the organization have established a compliance program that aims to prevent and detect corrupt practices. The compliance program will be overseen by the compliance officer, who will ensure that all employees received regularly training on the program.

The compliance program includes the following components:

Risk Assessment

The organization conducts risk assessments to identify areas where corruption risks have a high and very high probability to occur and proper measures to prevent or mitigate those risks. The risk assessment shall be updated regularly to ensure that new risks are identified and addressed.

Policies and Procedures

The organization shall establish policies and procedures that address specific corruption risks identified in the risk assessment. The policies and procedures shall be made available to all employees, and regular training will be provided.

Due Diligence

The organization will conduct due diligence on third parties, such as suppliers, contractors, and agents, to ensure that they comply with the organization's anti-corruption policy.

Monitoring and Reporting

The compliance officer will monitor the effectiveness of the compliance program and report regularly to senior management and the board of directors. Any suspected cases of corruption will be reported to the relevant authorities.

Training

Training is essential for ensuring that all employees understand the risks of corruption and the importance of maintaining high ethical standards. Regular training will be provided to all employees of the Company regarding good practices and measures to prevent corruption practices.

Code of Conduct

Critical condemns any practice of corruption, bribery, or related offenses, whether in an active or passive manner, as well as other forms of undue influence or illegal conduct. It imposes strict compliance with these principles in all its internal and external relationships, whether with private or public entities.

The organization has established a code of conduct that outlines the values, principles, and behaviors expected of all employees. The code of conduct is based on international best practices, applicable laws, and regulations. The code of conduct covers areas such as conflicts of interest, bribery, gifts, and entertainment.



In particular, it is expressly prohibited for all Employees to:

- a. Accept any advantages or offers in exchange for preferential treatment of any third party, in order to influence an action or decision.
- b. Offer or accept, under any circumstances and regardless of value, money, checks, and other goods subject to legal restrictions.
- c. Influence the decisions of business partners through any illegal means or actions that may appear to contradict applicable standards.
- d. Obtain any benefit or advantage for the company, the employee, or third parties through unethical practices or actions contrary to the duties of the position, including corruption, improper receipt of benefits, or trafficking of influence.

Whistleblowing

Whistleblowing is an important tool for preventing and detecting corruption. Employees should feel safe to report any suspected cases of corruption without fear of retaliation. To ensure this, the organization has established a whistleblowing system that guarantees confidentiality, anonymity, and protection for the whistleblower.

All employees are aware of the whistleblowing policy and the process for reporting suspected cases of corruption. The whistleblowing system will be overseen by the ombudsperson who shall ensure that all reports are properly investigated and appropriate action is taken.

Validity and Review

This Policy shall come into effect on the date of its approval by the Board of Directors and shall be reviewed every 3 (three) years or whenever there are any changes, particularly in the organizational or corporate structure of the Company, which justify its revision.

Any changes to the Policy must be approved by the Board of Directors.

This Policy, in its most current version, is disclosed to employees and is available for consultation on the official website (www.criticalsoftware.com)