

HASENKAMP RELOCATION SERVICES SPAIN SL

CRIME PREVENTION MODEL

Summary Document

1. INTRODUCTION

This document is a summary of the Crime Prevention Model that has been implemented and approved at HASENKAMP in order to adapt to the new law on the criminal liability of legal entities and thus prevent any activities that may be deemed to be contrary to the law from being carried out at or around the company.

HASENKAMP already had prevention and risk control systems in various fields and, through the Crime Prevention Model (hereinafter CPM), it includes the detection, control, and monitoring of criminal risks that may exist at the company.

As a fundamental basis for the CPM, a Code of Ethics was created which has been made available to all users on HASENKAMP's website.

2. CRIME PREVENTION MODEL

Implementation of the Crime Prevention Model has been carried out in accordance with Organic Law 5/2010, amended by Organic Law 1/2015 of March 30, and the Circular of the Attorney General's Office 1/2016 on the criminal liability of legal entities for committing crimes under the Spanish Penal Code.

In order to incur criminal liability for the company, these crimes could be committed by its executives, management, employees, and associates.

The Criminal Code now incorporates the requirement that legal entities exercise proper control over the company's activity and the actions of its personnel in order to prevent and detect activities that are likely to lead to the commission of crimes.

a. RISK AREAS:

In order to implement the Crime Prevention Model, the activities of the entity likely to incur criminal risks have been analyzed and specifically the department in which the activity is carried out at the company has also been identified. The prevention and control systems implemented focus on these activities and specific areas of the company.

b. RISK PREVENTION AND CONTROL SYSTEMS:

The following instruments have been implemented in order to prevent and mitigate potential risks that may occur at HASENKAMP:

Generic Instruments:

- **Code of Ethics:** A corporate document outlining HASENKAMP's principles and values that all company managers and employees are required to comply with. Each must read it, understand it, and sign it. In addition, the Code of Ethics has been published on the website with the aim of making it known to anyone who has a connection with HASENKAMP.
- **Ethical Channel:** There is a channel for complaints made available to all HASENKAMP employees, executives, associates, suppliers, and customers that may be used in a confidential manner and nominatively when a breach of the Code of Ethics or any other illegal activity is detected. This channel is ethical-channel-spain@hasenkamp.com
- **Compliance Committee:** In addition to the minimum content a Crime Prevention Model must contain, the Spanish Penal Code establishes the need for creating a body within the company that is responsible for monitoring compliance with the Crime Prevention Model. HASENKAMP has created said body with autonomous management powers and specific duties that will be detailed below.
- **Annual Evaluation and Updating of the Risk Map:** The Compliance Committee shall assume the role of assessing the potential risks of crimes being committed at the company and annually review and update the risk map.

Specific Instruments:

- **Specific protocols, policies, guidelines and procedures to mitigate vulnerabilities identified on the risk map.** All policies and procedures that establish definitions, regulations, and controls for the company's activities are properly documented and have been disseminated to all HASENKAMP personnel.
- **Contractual Clauses:** All contracts, whether employment contracts, contracts with suppliers, service providers or customers, have clauses linked to the Crime Prevention Model. Specifically, confidentiality and saving clauses have been incorporated for employees and certain suppliers which stem from the Personal Data Protection Act. These clauses are incorporated into contracts that must be signed after implementation of the CPM and will be included as an appendix to the aforementioned contracts.
- **Training and communication plan for employees and associates:** All HASENKAMP employees have been properly trained on the general aspects of the Crime Prevention Model and other rules and requirements that are part of it. Likewise, this summary of the Crime Prevention Model is published on HASENKAMP's website so that whoever collaborates with the company may access it.

c. CONTROL AND SUPERVISION OF THE CRIME PREVENTION MODEL.

1. Compliance Committee:

In order for it to be effective, the Crime Prevention Model requires the existence of an internal body at HASENKAMP to ensure proper implementation, enforcement, and to implement specific measures to avoid any identified risks. This body is also responsible for properly updating the Crime Prevention Model annually.

At HASENKAMP, the role of monitoring and controlling the Crime Prevention Model has been assigned to a body created for that purpose which is the Compliance Committee.

In accordance with the provisions of HASENKAMP's Crime Prevention Model, the Compliance Committee's main purpose is to manage the Model, ensuring it works and operates properly.

It must also comply with the policies, procedures, and measures implemented at HASENKAMP to prevent the identified risks and suggest the development and implementation of any policy and/or procedure it deems necessary.

Means and Powers of the Compliance Committee:

The Compliance Committee has full autonomy to carry out their duties with regard to HASENKAMP's partners and managers. It shall maintain constant, direct access to Management in order to be accountable for its management, report on measures and plans that have been implemented, and report anything it deems relevant.

In order to conduct the specific investigations it is responsible for, it shall have direct access to the different areas of the organization and may request and review any information relevant to the performance of its duties.

Responsibilities of the Monitoring and Control Body:

- Ensuring the Crime Prevention Model is implemented.
- Informing all associates, managers, and employees of the work culture which HASENKAMP follows in accordance with the law and, in particular, the existence of the Crime Prevention Model and control protocols and measures implemented and their obligations to comply.

- Monitoring and enforcement of the Crime Prevention Model by employees, partners, and associates.
- Detecting malfunctions in the Crime Prevention Model and possibilities for improvement.
- Preventing the commission of crimes within the organization.
- Assessing new activities that are likely to lead to the commission of a crime that should be incorporated into the Crime Prevention Model.
- Establishing policies, procedures, controls, and internal rules of action within the company with regard to the Crime Prevention Model.
- Following up on the decisions made regarding prevention and compliance with the rules and procedures in place.
- Detecting, analyzing, and controlling suspicious transactions.
- Making sure the channel for complaints is functioning properly.
- Giving the treatment to the complaints received as established in the protocol for handling them.
- Informing the complainant of the measures taken to halt the possible commission of a crime or offense.
- Safeguarding the complainant's rights and interests, confidentiality, and prohibiting retaliation because they filed a complaint.
- Adopting appropriate preventive measures after receiving complaints.
- Holding an annual meeting with those responsible for reviewing and updating of the Crime Prevention Model.

2. Ethical Channel:

So that the Crime Prevention Model functions properly, a channel for complaints has been developed as an integral part thereof pursuant to the Spanish Penal Code. What is sought is to stimulate and promote conduct from managers, employees, suppliers, and associates that is in accordance with HASENKAMP's ethical principles and values.

Procedure:

1. Every employee, executive, manager, supplier, contractor, shareholder, or third party related to the company has the right and duty to file a complaint for crimes, offenses, or ethics complaints which they have knowledge of through the following channels for complaints:
 - a) Via email to the account created for this purpose:

[ethical-channel- spain@hasenkamp.com](mailto:ethical-channel-spain@hasenkamp.com)
 - b) By means of a personal interview where an appointment with the Compliance Committee has been requested in advance.
2. The complaint may not be anonymous and must include the following information:
 - The complainant's full name
 - ID number
 - Position or relationship with the company
 - Address
 - Phone
 - Email
3. Complaints must contain the background they are based on:
 - The alleged violation, a description of the events, the place and reference dates, name, position and relationship the persons involved have with the company.
 - An explanation of the circumstances of how the events unfolded.
 - How the person became aware of the allegations.
 - Identifying the persons who committed the acts, indicating their full name, position and department, or information that would enable them to be identified.
 - Identifying any persons that witnessed the events reported or had facts about them, if they were known by the complainants.
 - Any information that may be useful for investigating the allegations.
 - Documents, records, and any other means which the complaint is based on.
4. All complaints must be filed in good faith.
5. All complaints will be registered by the Compliance Committee.
6. The Compliance Committee will treat the complainant's identity and the content of the complaint with utmost confidentiality.
7. Upon receipt of a complaint, the Compliance Committee shall meet with the complainant within a maximum period of 15 business days from the date the

complaint was received. Thereafter, it shall have 15 days to decide on the admissibility of the complaint.

8. Should it give credence to the complaint filed, the appropriate measures shall be taken within a maximum period of three months (additional investigative measures, disciplinary action, filing of legal action).
9. In any case, specific measures to prevent the crimes reported must be taken and the complainant must be verbally informed.
10. A report shall be drawn up for each complaint containing the conclusions. Only the Compliance Committee shall have access to it and it must adopt the necessary measures to ensure the offenses or illegal acts in the complaint are not committed.
11. Any complaints requiring specific investigative measures may delay submission of the results from the allegations. No case may take more than 3 months from receipt.
12. In any case, any complaints that have not been proven, that lack veracity or objectivity, or which are not deemed serious enough by the Compliance Committee, shall be closed.

d. Disciplinary System

A breach of the Code of Ethics and the existing regulations as a result of the implementation of the Crime Prevention Model may lead to disciplinary sanctions in accordance with HASENKAMP's internal regulations and the current labor laws.