MANAGING CONFLICTS OF INTEREST

Internal Regulations – Corporate Policies

Date: November 2021

Code: PC-04-5.2-03-202111

Introduction

Approval of the Global Dominion Access, S.A., (hereinafter "**Dominion**") Managing Conflicts of Interest Policy (hereinafter, the "Policy") is yet another milestone in Dominion's steadfast commitment to lawfulness, ethics and professionalism that underpins how it conducts its operations and its corporate culture.

Pursuant to this Policy, Dominion is firmly committed to:

- Complying with and fully adhering to all current legislation (both nationally and in the countries where it operates).
- Complying with the principles that govern its Code of Conduct which forms the basis of the Policy set out here.
- Training and raising awareness of the Obligated Parties (as this term is defined below), as well as stakeholders and third parties engaging with it, of the importance of complying with this Policy.
- Applying penalties for non-compliance with the provisions set out herein, pursuant to the applicable disciplinary measures.

Using this Policy, Dominion intends to establish the procedures that must be followed to prevent or, as the case may be, address conflicts of interest that may arise between shareholders, members of the Administrative Body, Directors and other Dominion employees in their dealings with Dominion's activities, as well as regarding conflicts that may arise with customers, suppliers and other stakeholders.

Scope of application

The Policy applies to all employees, managers and directors of all the companies that make up Dominion (hereinafter "**Obligated Parties**").

For the purposes of this Policy, "Dominion" shall also mean all companies which Global Dominion Access, S.A. controls or may control, directly or indirectly, with control being understood to be:

(i) holding the majority of the voting rights;

(ii) the right to appoint or remove a majority of members of the Board of Directors; or

(iii) holding the majority of the voting rights pursuant to eventual agreements made with third parties.

Likewise, all third parties who have dealings with Dominion will also indirectly receive this document and, whenever possible, must be made aware of the underlying principles and values.

Commitments and principles of conduct

A conflict of interest arises when personal, professional, financial or other types of relationships interfere or may interfere with the impartiality or loyalty of a Obligated Party.

Generally speaking, Dominion deems a conflict of interest to be: an actual conflict of interest (the Obligated Party faces a real and existing conflict), a potential conflict of interest (the Obligated Party is or could be in a situation that could result in a conflict of interest) and a perceived conflict of interest (the Obligated Party is or could be in a situation that could be perceived as conflictive, even if it is not an actual conflict of interests).

A conflict of interest can be a direct conflict when the Obligated Party itself or a company controlled by the Obligated Party has a conflict of interest, whereas an indirect conflict of interest is considered to be when such conflict stems from an immediate or close family member of the Obligated Party.

Dominion establishes the following principles and guidelines with regards to conflicts of interest:

- Preventing conflicts of interest at Dominion will always be governed by the obligation of everyone who forms a part of Dominion to pursue Dominion's interests in their professional activities, and under no circumstances may they put their own personal interests ahead of Dominion's, which includes the interests of all of its stakeholders.
- Dominion's activities will also always be carried out in such a manner as to protect the legitimate rights and interests of all its stakeholders under the principle of equal treatment and non-discrimination.
- Dominion respects the privacy of Obligated Parties and their right to engage in legitimate professional or financial activities outside their professional relationship with Dominion and to engage in other professional activities on their own account or on behalf of others, provided that such activities do not affect their work performance, that there is no exclusivity agreement and that there is no conflict of interest under the present Policy.
- Dominion forbids unfair competition. Damage or actual financial loss suffered by Dominion is not a condition for unfair competition, but rather the existence of a risk or potential for damage is sufficient for unfair competition to take place.
- Forbidden unfair competition not only applies during periods in which the Obligated Party performs professional activities, but also during times when the work relationship is suspended or when they are not working such as holidays, leaves of absence, temporary suspensions of employment, or temporary disabilities.
- Nor can Dominion be used as a promotional platform to pursue outside interests, whether these be business related or otherwise, or in the interest of immediate or close friends or family members.
- All Obligated Parties are required to proactively declare any possible conflict of interest either they or others may have, as soon as they become aware of such a situation. In such cases, they must immediately notify the officer in charge of the department, area or unit where this situation has arisen. The Risk & Compliance department will be contacted whenever any doubts arise.

Preventing and Handling Conflicts of Interest

The general principles of conduct in the event of a conflict of interest shall be as follows:

- Every Obligated Party with a real or potential conflict of interest must abstain from deliberations and decision making.
- Every Obligated Party with a real or potential conflict of interest must abstain from accessing confidential information.
- Every Obligated Party with a real or potential conflict of interest must remain transparent and proactively declare conflicts of interest.
- Every Obligated Party with a real or potential conflict of interest must co-operate in the resolution of conflicts of interest.

Reporting Wrongdoings

All Obligated Parties and third parties have a Whistleblowing channel to report any conduct that may involve any wrongdoing or any illegal actions or any actions that go against the Code of Conduct or Policy. For further details regarding the Whistleblowing Channel, consult the Code of Conduct.

Document sheet

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