



ANTITRUST COMPLIANCE POLICY

1.- INTRODUCTION

The Board of Directors of Aernnova Aerospace Corporation, SA, approves this antitrust compliance policy (hereinafter, the "Policy"), which is included in the Corporate Social Responsibility Policies and shall be applicable to all subsidiaries of the Group of which it is the parent company (hereinafter all of them shall be referred to as "Aernnova", the "Company" or "the Group").

Aernnova specialises in the design, manufacture, and maintenance of advanced technology aerostructures, as well as related components, systems and equipment, contributing with its mission to connect people and to economic and social development.

2- SUBJECT

This Policy reaffirms and reinforces Aernnova's commitment to compliance with the competition and antitrust laws applicable in each jurisdiction in which it operates.

Aernnova seeks to compete effectively in all the countries in which it operates, within the legal framework and without incurring in breaches of antitrust laws, with the aim of fostering the trust of suppliers, customers, collaborators, financiers, authorities, and other related parties, thus protecting its business from any unlawful conduct that could affect its reputation and generate criminal and/or administrative liability.

Thus, this policy establishes the general framework and the principles of action that must govern the Group in the different markets, areas of activity and sectors where it carries out its business and, in its relations, and agreements with third parties, reinforcing and consolidating both the culture of regulatory compliance and free competition, always against collusive conduct, abuse of dominant position and distortion of free competition through unfair acts.

3- FUNDAMENTALS

1- Aernnova, as part of its general policy of zero tolerance towards any breach of the law or of the principles contained in its Code of Ethics, will also promote a culture based on this principle of zero tolerance towards anti-competitive practices.

2.- Compliance with antitrust rules is not only a legal obligation, but a central element of the Group's culture towards its customers, suppliers, and society in general.

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3.- It is prohibited to reach agreements or carry out concerted practices between competitors that by their object or effect could restrict competition between economic operators (such as, but not limited to, fixing prices or other commercial conditions, sharing markets or customers, limiting, or controlling production, etc.).

4.- Commercially sensitive information shall not be exchanged with competitors or third parties, such as individualised, disaggregated and/ or recent or future data on strategic variables such as prices, discounts, quantities or present or future sales volumes.

5.- If any Group company has a dominant position in the markets in which it operates, it shall adopt guidelines for its relations with competitors, customers, suppliers, and end users, as well as specific precautions to prevent it from taking advantage of that position to impose abusive conditions on other market operators.

6.- It will analyse, prior to its execution, any transaction that may be a concentration in order to determine whether the transaction: (i) may be considered a concentration, (ii) must be subject to prior notification to the competent authorities, or (iii) requires suspension of its execution until authorisation has been obtained from the corresponding competition authorities.

7.- It shall promote and develop the culture of antitrust law compliance, and its commitment set out in the Code of Ethics to comply with the competition and antitrust laws applicable in each jurisdiction, reinforcing the awareness of relevant people in the organisation

8.- It will establish and update as necessary appropriate controls and preventive measures for the identification, prevention, mitigation, and control of risks associated with anti-competitive behaviour.

9.- It will promote the use of the Internal Reporting System set out in Aernnova Group's Policy of general principles regarding the Internal Reporting System and Whistleblower Protection to report or denounce possible irregular conducts or potential unlawful acts or acts contrary to the law, the Code of Ethics and/or this Policy that refer to or affect the scope of the activities of the Group's companies on competition matters.

10.- It shall cooperate in all that may be required by the competition authorities for the investigation of any conduct that may constitute an infringement of the applicable competition law.

4- STAKEHOLDERS COMMUNICATION AND ENGAGEMENT

This Policy is targeted to all Stakeholders: Customers, Authorities, Shareholders, Employees, Suppliers, and Consumers and Society as a whole. It has been communicated and is understood within the scope of the organization and is available through the communication and information channels that the company makes available to all its stakeholders. It is publicly available on the Aernnova website.

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