



ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING POLICY

1.- INTRODUCTION

The Board of Directors of Aernnova Aerospace Corporation, SA, approves this anti-corruption and anti-money laundering 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

The purpose of this Policy is to establish and disseminate the Group's basic principles of action to prevent corrupt business practices and money laundering.

Aernnova thus assumes the responsibility of actively participating in the challenge of combating corruption and money laundering in all its areas of activity, thereby contributing to the achievement of the sixteenth goal of the Sustainable Development Goals approved by the United Nations.

This policy accredits Aernnova's commitment to the permanent monitoring and sanctioning of fraudulent acts and conducts or conducts that facilitate corruption in any of its manifestations, the maintenance of effective communication and awareness-raising mechanisms for its personnel and the development of a corporate culture of ethics and honesty.

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 corruption in business in all its forms. This includes situations in which the related person is placed in a context of conscious or deliberate ignorance with respect to acts of which he/she is obliged to be aware of.

2.- Aernnova will apply the principles of ethics and responsible behaviour to all staff, regardless of their hierarchical or functional level.

3.- The Group shall not tolerate, permit or become involved in any behaviour constituting corruption, in any form, in the performance of business or professional activities, or in relations with the public sector or in the private sphere.

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4.- Illegal actions and/or actions that are not in line with this Policy shall be prohibited, regardless of the possible economic benefit generated.

5.- Aernnova will promote the use of the channels provided for in the Internal Reporting System set out in the Policy of general principles regarding the Aernnova Group's Internal Reporting System and Whistleblower Protection to report or denounce possible irregular conduct or potential illegal acts or acts contrary to the law, the Code of Ethics and/or this Policy regarding corruption and/or money laundering that refer to or affect the scope of the activities of the Group's companies.

4-. UNACCEPTABLE BEHAVIOUR

Aernnova considers the following conducts unacceptable in the course of its business:

4.1 Corruption

Corruption is understood as offering, promising, giving, authorizing, requesting, accepting or receiving anything in exchange for an undue advantage. That is, it refers to dishonest or illegal practices occurring in the business environment, where companies, their employees or related persons engage in fraudulent activities, bribery, extortion or other forms of improper behaviour to obtain financial or commercial advantage in an illegal or unethical manner.

The offer can take many forms, from money to benefits in kind, such as entertainment, travel, upgrades, getaways, sponsorship, or any other conduct with similar characteristics. It can also consist of the offer of other types of personal or professional benefits in exchange for the performance of certain actions that could be qualified as improper, personal abuse or harassment in any of its forms.

Undue advantage can also take many forms, such as preferential treatment, closing of a contract, retaining a business, transmission of confidential information, etc.

4.1.1. Corruption in the public sphere

- (i) Corruption in the public sphere, in addition to any other situation that may be considered as such under the applicable law in each case, is considered to include:
 - a. The act of offering, promising, giving, authorizing, delivering, requiring or giving, by oneself or through an intermediary, any undue advantage to a public official.
 - b. Influencing the decision of a public official without giving him or her any undue advantage but taking advantage of any situation arising from a personal, family, corporate, business, professional or other relationship with that or another public official.
- (ii) Acts of corruption shall also be prohibited in cases where the proposal is made by the public official or even in cases involving extortion or any other coercive conduct by the public official.
- (iii) This Policy prohibits acts of corruption irrespective of the officials or persons corrupted or the country where the conduct takes place.

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4.1.2 Private Corruption

- (i) Corruption in the private sphere, in addition to any other situation that may be considered as such under the applicable law in each case, is considered to include:
 - a. Promising, offering, granting, authorizing, requesting, accepting or receiving, by oneself or through an interposed person, to representatives or collaborators of a company, an undue advantage in order to favour Aernnova or any of its subsidiaries.
 - b. Receiving, authorizing, soliciting, or accepting, by oneself or through an intermediary, an undue advantage in order to favour the person who grants it.
- (ii) Private corruption is prohibited regardless of the nationality of the corrupted person or the place where the conduct occurs.

4.1.3. Other forms of corruption

For the avoidance of doubt, this Policy also prohibits other corrupt practices, such as (but not limited to):

- (i) Influence peddling: is a form of corruption where a person uses his or her position, personal relationships, or influence, real or supposed, to obtain favourable treatment or special benefits from a government entity, business or another organisation.
- (ii) Extortion can be defined as the attempt to obtain a benefit through the use of violence, threats, intimidation or psychological pressure.

4.2 Fraud in books and records

No manipulation of, or false, misleading or artificial entries in the Group's books and records for the purpose of hiding losses, inflating earnings or misleading investors, shareholders, regulators or other interested parties will be tolerated. This type of fraud may involve falsifying accounting data, omitting relevant information, creating fictitious transactions or any other act intended to distort Aernnova's true image.

4.3 Money laundering

Money laundering is a process by which the proceeds of illegal or illicit activities are introduced into the financial system in such a way that they appear legitimate and come from legal sources. The main objective of money laundering is to conceal the illegal origin of funds in order to avoid detection of their criminal nature.

Money laundering is not limited to specific criminal activities but can be associated with a wide range of illegal activities such as, but not limited to, drug trafficking, corruption, financial fraud, tax evasion, terrorism, smuggling and other forms of criminal activity.

The money laundering process generally consists of three phases:

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- (i) Placement: in this initial stage, illicit money is introduced into the financial system. This may involve splitting large sums into smaller amounts, making deposits in bank accounts or making investments in tangible assets.
- (ii) Concealment: once the money is inside the financial system, it seeks to hide its illegal origin. This involves complex and confusing financial transactions, often across multiple accounts or jurisdictions, to make the money difficult to trace.
- (iii) Integration: in this final stage, laundered money is integrated into the legal economy and used to purchase assets, invest in businesses or conduct commercial transactions as if it were legitimate money.

Thus, for the purposes of this Policy, money laundering is defined as, in addition to any other action that is considered to be money laundering under the applicable law in each case:

- The conversion or transfer of property (advantages/assets that results from the commission of certain types of offences), knowing that such property is derived from criminal activity or from participation in criminal activity, for the purpose of concealing or disguising the illicit origin of the property or of helping persons involved to evade the legal consequences of their actions.
- The concealment or disguise of the true nature, source, location, disposition, movement or ownership of property or rights with respect to property, knowing that such property is derived from criminal activity or from participation in criminal activity.
- The acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from participation in criminal activity.
- Participation in any of the activities referred to in the preceding paragraphs, association to commit such acts, attempts to commit such acts, and aiding, abetting or counselling anyone to carry them out or to facilitate their execution.

Proceeds of crime shall mean any type of asset, whether movable or immovable, tangible or intangible, and legal documents or instruments in any form, including electronic or digital, evidencing title to or interest in such assets, acquired or possessed as a result of criminal activity.

5- GIFTS AND DONATIONS

5.1 Gifts

For the purposes of this Policy, a gift in the context of business relations is understood to be any value that is given or received openly and transparently as a symbol of gratitude.

In accordance with the provisions of Aernnova's Code of Ethics, Group members may not offer or accept gifts or hospitality that go beyond the purely symbolic or protocol

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and under no circumstances may they be interpreted as an attempt to unduly influence a commercial, professional or administrative relationship.

5.1.1 Acceptance of gifts

Gifts or hospitality may only be accepted if they are considered normal courtesy and if the following conditions are met:

- (i) They are in accordance with applicable laws.
- (ii) They are not given with the intention of influencing third parties or obtaining any undue advantage from them.
- (iii) They are not undertaken for the purpose of obtaining or retaining a particular business or business advantage.
- (iv) They are not intended to obtain or exchange favourable treatment.
- (v) They must be offered or received in an open and transparent manner.
- (vi) They are not likely to give rise to conflicts of interest.
- (vii) That they are not gifts of cash, gift cards or any other medium that allows the transmission of money, which are expressly prohibited (excluding gifts that the Company itself gives to its employees and/or that employees may give to each other).

Any gift received that contravenes the above must be immediately returned or rejected, and the Aernnova's Compliance Officer shall be notified of this circumstance.

5.1.2 Granting of gifts

Only gifts or hospitality may be offered, provided that they are considered normal courtesy practices and meet the same requirements as those set out in section 5.1.1 above.

5.2 Donations

For the purposes of this Policy, a donation is any voluntary act of transferring goods, money, services or any other type of resource from one person, organisation or entity to another without expectation of financial compensation or direct benefit in return. Donations shall be made for the purpose of assisting a charitable cause, a non-profit organisation, persons in need or any other entity in need of support.

Donations or sponsorships shall always be made in accordance with applicable laws and shall never be linked, directly or indirectly, to illegal acts or improper benefits.

Donations may not be made for the purpose of conditioning the signing of contracts or any other benefit in favour of Aernnova. In any case, it is forbidden to make donations to political parties, either directly or indirectly.

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6- COMMUNICATION AND STAKEHOLDERES ENGAGEMENT

The anti-corruption and anti-money laundering 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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