

## COMPLIANCE PROGRAM

The Compliance Program is built around the implementation of the Compliance Policies, the monitoring and continued dynamism thereof.

The six pillars on which the Program and the Policy are built are:

### 1- Leadership

The Board of Directors and Management for the QUADPACK GROUP, together with the employees, ensure the efficient operation of business activities using a systematic approach to assess and manage the risks, as well as to ensure that the organisation and its employees comply with current legislation, the regulations and standards in force and also the corporate standards of conduct:

The functions of the Compliance Policies are to:

- Create a comprehensive framework that supports the company's strategic aims and is able to react rapidly to change.
- Create a culture that encourages ethical conduct and a decrease of the risks that could entail the commission of offences.
- Establish policies and procedures to prevent and detect illegal conduct and activities.
- Assure the Board of Directors that reasonable supervision of the Policy is being exercised.
- Exercise due diligence measures.
- Provide effective training programs for directors, middle managers, employees and other agents of the company.
- Ensure that the Policy is being implemented by the *Compliance Officer*, as well as ensuring that it is being supervised and audited by means of regular assessments of its efficacy.

### 2- Risk analysis

The basis for the Compliance Policies has been a thorough risk analysis of the whole company, detecting any risks that could entail the commission of an offence and working on them to avoid these possible future offences. The risks have been classified into categories according to their severity and the degree of tolerance of each of them.

### 3- Procedures

Following the risk analysis, QUADPACK has carried out an analysis of the procedures to be implemented for each particular risk, according to its characteristics and its possible impact on the commission of crimes. The established procedures are followed by control processes, which are not exhaustive and are periodically reviewed in order to adapt them to the prevailing legislation and market.

#### 4- Training

The training of employees with regard to responsibility and compliance is a key aspect for the effective implementation of the Compliance Policies. Training in Penal *Compliance* will be coordinated by the Human Resources department and will be done both in writing via manuals, as well as orally via the provision of courses.

#### 5- Disciplinary proceedings

The employee shall be guilty of an offence when he/she breaches their occupational or professional obligations in a manner that is negligent or malicious. The disciplinary system foreseen for these cases shall be applied in line with employment legislation, which is applicable to each employee.

#### 6- Monitoring and improvement

The Compliance Policy is a dynamic instrument that will be monitored and will undergo periodic reviews by the *Compliance Officer* to improve it and adapt it to changing times, both within the company, as well as the market as a whole.