**Revisión History**

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| **Version** | **Data** | **Summary of Updates** |
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**CRIMINAL COMPLIANCE POLICY**

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| --- | --- | --- | --- | --- | --- | --- |
| **Category** | **Manager** | **Periodicity** | **Type** | **Execution type** | **Processing of observations** | **Execution test** |
| **Process** | **Compliance Officer** | **Permanent** | **Prevention** | **Manual** | **Foreseen** | **Foreseen** |

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| **Document reference** | **Created by:** | **Reviewed by:** | **Approved by:** | **Date of approval** |
| **C-1** | **Waterwhale Europe S.L.** |  |  |  |
| **Revision: 01** |

Carbotainer S.L. - hereinafter Carbotainer - maintains a zero tolerance position towards illegal acts, committing itself to act professionally, transparently and with integrity in all its business dealings and relationships.

Carbotainer operates on an international scale, through direct sales of its products as well as through its network of subsidiaries in France and the United States of America. The complexity of its activities, the organization and its operations include different variables, such as the manufacture of carbon fiber cylinders, as well as research and development related to this material, having developed and patented the Smart Carbon Cylinder SCC, with the objective of being a profitable and highly productive company while respecting the demanding regulations of the countries in which it operates.

With the firm intention to prevent the commission of crimes within our organization, we have implemented a "tailor-made" Criminal Compliance Management System that complies not only with legal requirements, but also with the highest international standards in the field. Carbotainer has an Ethics Committee, a body that exercises its functions with full authority and independence within the company, whose main responsibility is to implement the Criminal Compliance Management System and that it is consistent with the purposes of the organization previously exposed, as well as to supervise its application and effectiveness, identifying the activities in whose scope crimes may be committed, promoting adequate communication and training to all members of the organization.

Our Criminal Compliance Management System binds all members of Carbotainer, including the management body, its managers and employees, as well as its business partners (suppliers, customers and other operators that collaborate with it). This System is composed of policies, processes and procedures necessary for its implementation. The main policies are:

* the Criminal Compliance Policy.
* criminal Compliance Program.
* code of Ethics.
* gifts and attentions Policy.
* incident Communication and Investigation Procedure (PCII).
* disciplinary Code.

These policies are available to employees at the following link: TEAMS

The importance of Carbotainer's Criminal Compliance Management System lies in minimizing the risks faced by the Company in its daily business. In thisline, Carbotainer is committed to maintain the continuous improvement of the Criminal Compliance Management System. To this end, Carbotainer, according to the *Performance Assessment Policy PR-C-33*, determines an appropriate framework for the definition, review and achievement of the objectives of its Criminal Compliance Management System.

Carbotainer requires its members to comply with regulations and to act in accordance with the law in general and criminal law in particular, as well as with Carbotainer's core values. Any unethical behavior and the commission of criminal acts are prohibited and will be sanctioned in accordance with our Disciplinary Code.

All members of Carbotainer who have acknowledge of any conduct related to any criminal act or contrary to the Group's internal regulations, or suspected of being so, must report it to the Company through the Incident Communication Channel, guaranteeing the absence of any type of retaliation against them.

This Criminal Compliance Policy is made available to all interested parties, in Spanish and English language, among other means of communication through the corporate website and will be communicated to all members of Carbotainer, as well as to business partners on which criminal risks may arise.