

1. Risk Activities of INTARCON

El The corporate purpose of INTARCON is the design, manufacture and marketing of equipment and solutions based on refrigeration and air conditioning technologies, so that in the performance of any of its activities to that effect, different risk situations may arise that may lead to the commission of any of the Relevant crimes.

For this reason, our company has identified the activities of its business which are indicated below in which, from an ABSTRACT point of view, one of the Relevant Offences may be committed and which, therefore, must be qualified as risk activities subject to supervision by the Compliance Committee.

2. Crimes and performances policies

A table is attached here to:

- The offence subject to risk assessment.
- The most common criminal conduct relating to that type.
- Possible risk activities.
- The procedures to be followed or the policies to be adopted, classified according to each of the Relevant Offences.

Clarify that risk activities are those behaviours inherent to the Company's activity, in the exercise of which the commission of a crime may occur. The classification of an activity as "risky" does not imply that it is illegal or criminal, but rather that it is an activity in which, if due precautions are not taken, situations may arise that may generate conflicts with criminal implications.

Likewise, the action policies are the protocols or procedures to be followed established by INTARCON with the aim of preventing the commission of criminal conduct in the exercise of risk activities.

Typified offence

1. Discovery and disclosure of secrets (Art. 197 CP)

Criminal conduct

- a. Seize papers, letters, e-mails or any other documents or personal effects in order to discover the secrets or infringe the privacy of another.
- b. Intercepting telecommunications or using technical devices for listening, transmission, recording or reproduction of sound or image, or any other communication signal in order to discover the secrets or infringe the privacy of another.
- c. Access by any means, without being authorised, to reserved data of a personal or family nature of another that are registered in computer, electronic or telematic files or supports, or in any other type of public or private file or register.

Taking possession, using or modifying, without authorisation and to the detriment of third parties, reserved data of a personal or family nature of another which are registered in computer, electronic or telematic files or supports, or in any other type of public or private archive or register.

Risk activities

- a) Processing of external personal data: customers, suppliers or any other person with whom the INTARCON Group may maintain business relations.
- b) Treatment of internal personal data: partners, Professionals and/or Employees, etc.

Access to Employee communications and monitoring the use of electronic mail and the Internet.

Preventive measures to be taken

- A. Strict compliance with the Code of Ethics.
- B. Strict compliance with the Security Document and Internal Security Regulations, which will be implemented in INTARCON and which will aim to give due compliance to Royal Decree 1720/2007, of December 21, which approves the Regulations for the development of the Organic Law 15/1999, of December 13, on the protection of personal data.
- C. Preparation of an annual report in which potential risks of illegal actions are identified.
- D. Collect, under certain circumstances, and with prior authorization signed by workers and / or employees, so that during the duration of the employment relationship, the employer may register the data of their Internet access, as well as their emails for business control purposes.
- E. Instruct all INTARCON professionals that the protection of information requires the use of only the tools INTARCON puts at their disposal to fulfill their professional functions, given that such tools are safe.
- F. In this sense, the following behaviors are prohibited in INTARCON:
 - (i) connect resources such as other networks, subnets, servers, electronic hub connection devices, routers, switches, wireless network devices or devices with bluetooth technology to a network. For such connections, prior written authorization from the INTARCON Technology Department is necessary.
 - (ii) connect equipment from the INTARCON network to equipment connected to another external network without the supervision of the INTARCON R + D + I Department.
 - (iii) use the network, computers or other resources of INTARCON or a third party to obtain

Typified offence

2. Scams (Arts.248-251 CP)

Criminal conduct

- a) Deceive another by inducing him to perform an act of disposition to his own or another's prejudice.
- b) Alienate, encumber or lease by falsely attributing to a disposition faculty that is lacking, either for never having had it, or for having exercised it before.
- c) c. Have a thing hiding the existence of any burden on it.
- d) d. Having disposed of a thing as free, dispose of it or tax it again before the final transfer to the acquirer
- e) Grant a simulated contract to the detriment of a third party.

Risk activities

- a) Real estate operations: sale, rent, constitution of mortgages.
- b) Conclusion of contracts with third parties or with other companies of the INTARCON.
- c) Attraction of investors for any business projects.
- d) Application for credit or loans.
- e) Communications with claims insurance.
- f) Simulation of claims on insured property.
- g) Subscription of commercial contracts in operations of sale of materials or services.

Preventive measures to be taken

A. Preparation and maintenance of books, records and accounting entries that, in reasonable detail, accurately and faithfully reflect the transactions and dispositions of the Company's assets. These books, records and accounts must be prepared and maintained in accordance with accepted methods of recording economic events, with the fundamental objective of preventing the disposal of funds that are beyond the Company's accounting control.

B. Strict compliance with the Ethics Code.

C. Registration of the operations, contracts and legal businesses whose amount is superior to 1,000 euros of which INTARCON is part and, in particular, of the communications with the counterparties.

Approval by the Chief Executive Officer of any operation, contract or legal business whose amount exceeds 100,000 euros.

Typified offence**3. Punishables Insolvencies (Arts. 257-261 CP)****Criminal conduct**

- a. Avoiding the payment of debts by concealing assets and rights.
 - b. Carrying out any act of disposition of assets or generating obligations that delays, hinders or impedes the effectiveness of a seizure or of an executive procedure initiated or of foreseeable initiation.
 - c. To carry out, being declared bankrupt and without the necessary authorisation, acts of patrimonial disposition or generator of obligations destined to pay one or several creditors, privileged or not, with postponement of the rest.
 - d. Fraudulently causing or aggravating the situation of economic crisis that the declaration of bankruptcy entails.
- Presenting false data relating to the accounting status in a bankruptcy procedure with the aim of achieving an undue declaration of bankruptcy.

Risk activities

- a) Payment of creditors.
- b) Collection from debtors.
- c) Situations of lack of liquidity of INTARCON.
- d) Situations of lack of liquidity of a debtor.
- e) Related-party transactions.

Preventive measures to be taken

- A. Preparation and maintenance of books, records and accounting entries that, in reasonable detail, accurately and faithfully reflect the transactions and dispositions of the Company's assets.
These books, records and accounts must be prepared and maintained in accordance with accepted methods of recording economic events, with the fundamental objective of preventing the disposal of funds that are beyond the Company's accounting control.
 - B. Documentary register of the operations, contracts and legal businesses whose amount is superior to (1.000 euros) of which INTARCON is part.
 - C. Prior notification to the Compliance Committee of any operation, contract or legal business to which INTARCON is going to be a party and whose amount exceeds 150,000 euros.
 - D. Approval by the Board of Directors or by the Chief Executive Officer of any operation, contract or legal business whose amount exceeds 100,000 euros.
 - E. Registration of inter-group operations.
- Seek legal advice in the event of any indication that INTARCON or a debtor is in a situation of lack of liquidity or insolvency.

Typified offence

4. Infringement of Intellectual Property Rights (Art. 270 CP).

Delinquent conduct

a) Reproducing, plagiarizing, distributing or publicly communicating a literary, artistic or scientific work without the authorization of the holders of the corresponding intellectual property rights or their assignees

Risk activities

- a) Downloading of files protected by intellectual property rights
 - b) Management of software licences.
- Organization of events.

Preventive measures to be taken

A. Prohibition of reproducing, copying, plagiarizing, distributing, modifying, assigning or communicating, totally or partially, products property of INTARCON without the due previous and written authorization of the Company.

B. Prohibition of reproducing, copying, plagiarizing, distributing, modifying, assigning or communicating, totally or partially, products owned by third parties (physical or juridical) without their prior and written authorization.

These third parties are not only customers and suppliers of INTARCON, but any individual or entity unrelated to INTARCON, even if it has no relationship with the Company.

C. The above prohibitions are particularly relevant to the software, so INTARCON professionals are prohibited.

(i) install and/or run on the computer equipment of INTARCON or third parties with which it is related, unlicensed, pirated or cracked software or any other illegally acquired way.

(ii) install, create or own any tool or product intended to remove protection from proprietary third party software.

D. Elaboration by the person in charge of technology of an annual report in which the potential risks of illicit actions are identified.

Typified offence

5. Infringement of Industrial Property Rights (Art. 274 CP).

Delinquent conduct

- a. Reproducing, imitating, modifying or usurping a distinctive sign that is identical or confusingly similar to an Industrial Property right registered under trademark law, in order to distinguish the same or similar products, services, activities or establishments for which the Industrial Property right is registered.
- b. Manufacture, import, possess, use, offer or bring into commerce objects protected by such Industrial Property rights.

Risk activities

- a) Use of other people's distinctive signs.
- b) Use of patentable inventions or other people's utility models.
- c) Use of other people's industrial designs.

Preventive measures to be taken

- A. It is forbidden to reproduce, copy, plagiarize, distribute, modify, cede or communicate, totally or partially, products or designs property of INTARCON without the previous and written authorization of the Company.
- B. It is forbidden to reproduce, copy, plagiarize, distribute, modify, transfer or communicate, in whole or in part, products owned by third parties (physical or legal) without their prior written consent.
These third parties are not only customers and suppliers of INTARCON, but any individual or entity unrelated to INTARCON, although it has no relationship with the Company.

Typified offence

6. Discovery and disclosure of trade secrets (Arts. 278-280 CP).

Delinquent conduct

- a. Taking possession by any means of data, written or electronic documents, computer media or other objects to discover a company secret.
- b. Disseminate, reveal or transfer to third parties company secrets discovered unlawfully.
- c. Dissemination, disclosure or transfer of a company secret by whoever is legally or contractually obliged to keep it confidential.

Risk activities

- a) Relations with investee companies.
- b) Relations with competitors.

Preventive measures to be taken

- A. Strict compliance with the Code of Ethics.
 - B. Signing of confidentiality clauses with Professionals and/or Employees that include the information obtained about third parties.
 - B. Strict compliance with the Internal Code of Conduct that applies to the members of the Board of Directors, Management Personnel, and other members of the Board of Directors and other Employees.
 - C. The following behaviors are prohibited in INTARCON:
 - (i) connecting resources such as other networks, subnets, servers, electronic hub devices, routers, switches, wireless network devices or devices with Bluetooth technology to a network. For such connections it is necessary the previous written authorization of the Technology Department of INTARCON.
 - (ii) connect equipment from the INTARCON network to equipment connected to another external network without the supervision of the INTARCON Technology Department.
 - (iii) Under no circumstances may the network, computers or other resources of INTARCON or a third party be used to gain unauthorised access to any other equipment or computer system.
 - (iv) the sending by e-mail of files or e-mails which may saturate or slow down the network traffic must also be done with the prior authorisation of INTARCON.
 - D. Professionals and/or Employees are obliged to respect company secrets; both those of INTARCON and those of the companies of the INTARCON X Group or other third parties with which it is related, according to their level of sensitivity and criticality. The information can be classified as: restricted, confidential, for internal or public use. Restricted information is the most sensitive and generally constitutes a business secret. Confidential information, also with a high degree of sensitivity, can only be known by those who require it because of their functions. The revelation of one and the other can have very serious consequences.
- Finally, each Professional and/or Employee of INTARCON must respect the security measures established by the Company to protect data, programs or computer systems. The intrusion in the same violating these measures constitutes hacking and is strictly prohibited.

Typified offence

7. Corruption between private individuals (Art. 286 bis CP).

Delinquent conduct

- a. Corruption between private individuals (Art. 286 bis CP). against others, failing to fulfil their obligations in the acquisition or sale of goods or in the contracting of professional services.
- b. Receive, request or accept a benefit or advantage of any nature not justified for the purpose of favoring third parties who grant it or who expect the benefit or advantage, failing to comply with their obligations in the acquisition or sale of goods or in the hiring of professional services.

Risk activities

- a) Commercial relations with third parties: customers, suppliers and service providers.
- b) Operations with companies of the INTARCON Group and with participated companies.
- c) Delivery of gifts to third parties: partners, customers, suppliers and service providers.
- d) Receiving gifts from third parties: partners, customers, suppliers and service providers.

Preventive measures to be taken

- A. Strict compliance with the Code of Ethics.
- B. Maintenance of a system of books, accounts and records that accurately reflect all operations and disposition of cash in the Company that guarantees:
 - (i) that the transactions of funds are executed in accordance with the general or specific authorization of the Professionals.
 - (ii) that transactions are recorded in a manner that permits both the preparation of financial statements in accordance with generally accepted accounting principles or financial reporting standards or in accordance with any other criteria applicable to such statements, and the maintenance of control of assets.

The record of transactions shall include the record of any commission, service, consulting fees, expenses for gifts, meals, travel and entertainment, as well as expenses for promotional activities. An adequate record of all this should include a clear reference to the nature of each expenditure, identifying recipients and/or participants, authorisations received for expenditure and approvals, etc.
 - (iii) that access to the assets of INTARCON be allowed only with the general or specific authorization of the Professionals;
- C. It is prohibited to falsify such books, records and accounts and to make false, misleading, incomplete, inaccurate or simulated entries or notes in books, records and accounts.

Typified offence

8. Tax and Social Security Fraud (Arts. 305-310 CP)

Delinquent conduct

- a. Defrauding the State, regional or local Public Treasury by more than 120,000euros.
 - b. To defraud the Public Treasury of the European Community by more than 50,000euros.
 - c. Defrauding Social Security by more than 120,000 euros.
 - d. Obtain subsidies, tax deductions or aid from public administrations of more than 120,000 euros, distorting the conditions required for its concession or hiding those that would have prevented it.
 - e. Improperly obtaining funds from the general budgets of the European Union or others administered by it, in an amount greater than 50,000 euros, distorting the conditions required for its granting or concealing those that would have prevented it.
 - f. Absolute non-compliance with accounting obligations or keeping of parallel accounts with an incidence of more than 240,000 euros.
 - g. Lack of entry in the obligatory books, or entry with figures other than the true ones, of businesses, acts, operations or economic transactions with an incidence of more than 240,000euros.
- Practice of fictitious accounting entries with an incidence of more than 240,000euros.

Risk activities

- a) Registration of operations in accounting books and formulation of annual accounts.
- b) Liquidation and self-assessment of tax obligations.
- c) Application for and justification of public subsidies and aid.
- d) Settlement of Social Security obligations.

Preventive measures to be taken

Maintenance of a system of books, accounts and records that accurately reflect every operation and disposition of cash in the company, which guarantees:

- (i) that the transactions of funds are executed in accordance with the general or specific authorization of the Professionals.
 - (ii) that transactions are recorded in such a way as to permit both the preparation of financial statements in accordance with accounting principles, or standards is financial reporting or in accordance with any other criteria applicable to such statements, such as maintaining control of assets, how to maintain control of assets. The record of transactions shall include the record of any commission, service, consulting fees, expenses for gifts, meals, travel and entertainment, as well as expenses for promotional activities. An adequate record of all this should include a clear reference to the nature of each expenditure, identifying recipients and/or participants, authorisations received for expenditure and approvals, etc.
 - (iii) that access to assets be allowed only with the general or specific authorization of the Professionals.
- B. It is prohibited to falsify such books, records and accounts and to make false, misleading, incomplete, inaccurate or simulated entries or notes in books, records and accounts.
- C. Strict compliance with accounting, tax and social security regulations.
- D. INTARCON is strictly prohibited from carrying out the following actions in the processes of applying for and obtaining subsidies and public aid:
- (i) the distortion, alteration or omission of any data or information required in the process of applying for or obtaining the public subsidy or aid.
 - (ii) non-compliance with or alteration in any way of any of the conditions laid down or the manner of execution of the project for which the grant or assistance was awarded.

(iii) the falsification, alteration or omission of any data or information on the project in execution in the corresponding follow-up reports to the corresponding public body.

(iv) the distortion or concealment of conditions, requirements or information may be carried out in many different ways but, in any case, it will imply that the information submitted, to the granting public body, is false or incomplete.

Hidden or distorted conditions, requirements or information may also relate to a wide range of elements or factors of the public subsidy or aid: not only must the information provided is truthful and complete with regard to the administrative conditions of the grant or aid, but also with regard to the project it is intended to be

Typified offence

9. Offences against natural resources and the environment (Art. 325 CP).

Delinquent conduct

- a. In contravention of laws or other provisions of a general nature, protecting the environment, causing or carrying out emissions, discharges, radiations, extractions or excavations, groundings, noises, vibrations, injections or deposits in the atmosphere, soil, subsoil or terrestrial, underground or marine waters, as well as water catchments which may seriously disturb the equilibrium of natural systems.
- b. Establish deposits or landfills for waste or solid or liquid waste that is toxic or hazardous and can seriously impair the balance of natural systems or the health of people.
- c. In contravention of laws or other general provisions, carry out the operation of installations in which a dangerous activity is carried out or in which dangerous substances or preparations are stored or used and which cause or are likely to cause death or serious injury to persons, or substantial damage to air quality, soil quality or water quality, or to animals or plants.

In the collection, transport, recovery, disposal or recovery of waste, including the omission of duties of surveillance over waste or hindering the inspection activity.

Risk activities

- a) Discharge of waste or emissions into the atmosphere of gases with environmental damage.
- b) Disobedience to express orders of the authority about the correction or suspension of activities.
- c) Misrepresentation of environmental information or procedures, seriously endangering the life, integrity or health of persons, or the quality of air, soil or water, or animals or plants.

Preventive measures to be taken

- A. Strict compliance with the Code of Ethics.
- B. Strict compliance with environmental regulations and the Environmental Management System and the Environmental Management Plan, implemented in INTARCON.
- C. Appointment of an environmental risk manager.
- D. To comply with the current Environmental Plan. Periodically review and maintain it.

Typified offence

10. Bribery (Art. 424 CP).

Delinquent conduct

a. To offer or deliver a gift or retribution of any other kind to an authority, public official or person who participates in the exercise of the public function to perform an act contrary to the duties inherent to his position or an act proper to his position, so that he does not perform or delay the act that he should perform in consideration of his position or function.

Risk activities

Relations with public administrations.

Preventive measures to be taken

- A. Strict compliance with the Code of Ethics.
- B. Any contact or negotiation with civil servants or former civil servants to explore their possible hiring as Employees or Professionals of INTARCON is subject to the rules on conflicts of interest in each local jurisdiction and, even if a hiring under certain conditions is prohibited, even if the civil servant is already retired.
- C. Any dealings with a public official or administrative authority in order to obtain an advantage in the commercial position of INTARCON before the administration for which the official works is prohibited, for past or future consideration, for actions, legal or illegal, carried out by the official for the benefit of INTARCON.
- D. Maintenance of a system of books, accounts and records that accurately reflect all operations and disposition of cash in the Company, which guarantees:
 - (i) that the transactions of funds are executed in accordance with the general or specific authorization of the Professionals.
 - (ii) that transaction is recorded in a manner that permits both the preparation of financial statements in accordance with generally accepted accounting principles or financial reporting standards or in accordance with any other criteria applicable to such statements, and the maintenance of control of assets The record of transactions shall include the record of any commission, service, consulting fees, expenses for gifts, meals, travel and entertainment, as well as expenses for promotional activities An adequate record of all this should include a clear reference to the nature of each expenditure, identifying recipients and/or participants, authorisations received for expenditure and approvals, etc.
 - (iii) that access to the assets of the INTARCON Group be permitted only with the general or specific authorisation of the Professionals.
- E. It is prohibited to falsify such books, records and accounts and to make false, misleading, incomplete, inaccurate or simulated entries or notes in books, records and accounts.

Typified offence

11. Influence peddling (Art. 429 CP).

Delinquent conduct

Influencing a public official or authority by taking advantage of any situation arising from his personal relationship with him or with another public official or authority in order to obtain a resolution that may directly or indirectly generate an economic benefit for himself or for a third party.

Risk activities

Relations with public administrations.

Preventive measures to be taken

- A. Strict compliance with the Code of Ethics.
- B. Any dealings with a public official or administrative authority in order to obtain an advantage in the commercial position of INTARCON before the administration for which the official works is prohibited, for past or future consideration, for actions, legal or illegal, carried out by the official for the benefit of INTARCON.



Typified offence

12. Corruption in comercial transactions (Art. 445 CP)

Delinquent conduct

By offering, promising or granting any undue advantage, pecuniary or otherwise, corrupting or attempting to corrupt, to foreign public officials or organizations is, for the benefit of these or a third party, or responding to their requests thereon, in order that they act or refrain from acting in connection with the exercise of public functions to secure or retain one contract or another, as well as to obtain an advantage in the commercial position of INTARCON before the administration for which the civil servant works, by means of past or future consideration, for actions, legal or illegal, carried out by the civil servant for the benefit of INTARCON.

Risk activities

Relations with foreign public administrations

Preventive measures to be taken

- A. Strict compliance with the Code of Ethics.
- B. Any contact or negotiation with civil servants or former civil servants to explore their possible hiring as Employees or Professionals of INTARCON is subject to the rules on conflicts of interest in each local jurisdiction and, even if a hiring under certain conditions is prohibited, even if the civil servant is already retired.
- C. Any dealings with public officials or administrative authorities for irregular gain in the conduct of economic activities are prohibited.
- D. It is mandatory to maintain a system of books, accounts and records that accurately reflect all operations and dispositions of cash in the Company, to ensure:
 - (i) that the fund transactions are executed in accordance with the general or specific authorisation of the management.
 - (ii) transactions are recorded in a manner that permits both the preparation of financial statements in accordance with generally accepted accounting principles, or financial reporting standards or any other criteria applicable to such statements, and the maintenance of control of assets. The record of transactions shall include the record of any commission, service, consulting fees, expenses for gifts, meals, travel and entertainment, as well as expenses for promotional activities. An adequate record of all this should include a clear reference to the nature of each expenditure, identifying recipients and/or participants, authorisations received for expenditure and approvals, etc.
 - (iii) that access to the assets of INTARCON be allowed only with the general or specific authorization of the Professionals.
- E. It is prohibited to falsify such books, records and accounts and to make false, misleading, incomplete, inaccurate or simulated entries or notes in books, records and accounts.

Typified offence**13. Crimes against moral integrity/work harassment (173.1 del CP)****Delinquent conduct**

Exposure to the behaviours of intense psychological violence, directed, repeatedly and prolonged over time, towards one or more persons by another person acting in front of them from a position of psychological power (not necessarily hierarchical), for the purpose of creating a hostile or humiliating environment that disrupts the victim's working life. Although this conduct does not directly imply a liability of the legal person, the lack of attention, prevention and control of these behaviours by the management of the company if it can become the criminal responsibility of the latter.

Risk activities

Treatment of colleagues.

Preventive measures to be taken

- 1.- Strict compliance with the Code of Ethics.
- 2.- Establish an anti-bullying procedure within the company and make it known to everyone.

Typified offence

14. Crimes against the safety and health of workers (316-318 CP)

Delinquent conduct

Those who violate PRL rules do not provide the necessary means for workers to carry out their activity with adequate safety measures. It is not necessary for harm to occur, it is only necessary for your life, health or physical integrity to have been exposed to risk.

Risk activities

Development of the company's work activity in the company's own work centre or in any other people's work space

Preventive measures to be taken

1. Strict compliance with the Code of Ethics.
2. Compliance with the Occupational Risk Prevention Plan and the set of procedures implemented in the company.