



ANTICORRUPTION POLICY

Approved by the Management Body

in November 2022

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1. OBJECT

This Anticorruption Policy (the “**Policy**”) is mainly aimed at ensuring compliance with the legal anticorruption requirements and implementing, among others, the general principle of integrity established in the Code of Conduct of Iridium Concesiones de Infraestructuras S.A. (“Iridium” or the “Company”) as a fundamental rule that shows its commitment to working in line with the most demanding ethical principles, transferring the importance of business integrity to all the members of the organisation (members of the Management Body, managers and employees).

For Iridium it is important to ensure that certain conduct that would compromise its business integrity is not permitted in the organisation. Specifically, with this Policy, Iridium prohibits any kind of bribery of authorities strictly prohibits any kind of bribery of public authorities or civil servants or employees belonging to public companies or bodies on a national or international level, as well as of third parties with which the company has any kind of relationship.

Therefore, Iridium is adopting this Policy with a view to designing a regulatory framework for the prevention and detection of corruption and bribery in the exercise of its activity and promoting full compliance with anticorruption and anti-bribery regulations by the members of the organisation.

2. SCOPE AND DEFINITIONS

This Policy is addressed to the members of the organization that maintain ties with the companies of the Iridium Group, regardless of the legal nature of their relationship.

However, we believe that all suppliers, advisors and business partners must observe the same ethical standards and principles. We must always inform our suppliers, advisors and business partners about the content of this Policy, and do our best effort whenever possible to ensure that the contracts entered into with them include the principles of this Policy.

Notwithstanding the foregoing, the companies of the Iridium Group may adopt their own Anti-Corruption Policies and internal regulations, provided that they are inspired by or aligned with the principles of this Policy.

Capitalised terms in this document that have not been expressly defined will be interpreted in line with the definitions contained in the Code of Conduct.

3. COMPLIANCE BODY

The body in charge of Iridium's Compliance function is the Compliance Committee, a collegiate body dependent on its Management Body and made up of the Director of Personnel and General Services, the Director of Administration, the Director of Legal Counsel, the Head of Internal Audit and the Compliance Officer who acts as a non-member secretary.

The Compliance Committee has autonomous initiative and control powers to prevent crimes, has adequate human, economic and material resources to design, develop, implement, evaluate, maintain and improve Iridium's Criminal and Anti-Bribery Compliance Management System and control the implementation, maintenance and improvement of the Management Systems of its subsidiaries.

4. GENERAL PROHIBITIONS

In general terms, Iridium expressly prohibits the following conduct:

- any kind of bribery of public authorities or civil servants or managers or employees belonging to public companies or bodies on a national or international level, as well as of third parties with which the company has any kind of relationship, be it a public entity or and individual, in order to obtain undue advantages.

Consequently, the execution, promise or offer of any kind of payment to public authorities or civil servants or managers or employees belonging to public companies or bodies on a national or international level is prohibited, be it direct, or indirect via agents, suppliers, advisors or any interposed persons.

- Neither is it permitted to obtain unfair advantages by benefitting from personal relationships with public authorities or civil servants or with any other private subject.

Iridium requires that all decisions adopted by members of the organisation who have any kind of relationship with national and international public administrations be strictly in accordance with the law and the Rules.

5. GENERAL PRINCIPLES

- **Gifts and hospitality**

Iridium prohibits the members of its organisation from giving or accepting presents, gifts, hospitality or favours in the performance of their activities. On an exceptional basis, the giving or accepting of presents and gifts will be admitted, provided it is not prohibited by law and it is in line with the criteria envisaged in the Iridium Presents, Gifts, Hospitality and Favours Policy.

- **Facilitation payments**

Facilitation payments are strictly prohibited under this Policy; this is understood to mean those payments of small amounts to public servants designed to have them expedite or facilitate the performance of their duties such as, for example, access to public services, obtaining ordinary licences or business permits and/or administrative formalities.

Any activity that could entail a facilitation payment made or accepted by Iridium or on its behalf should be avoided.

- **Charitable donations**

Charitable donations will meet the following criteria:

- They will be made to charitable organisations that are preferably not recently created, that are reliable and that have an excellent reputation. To carry out this analysis, the person responsible for processing the donation must complete the compliance questionnaire¹ attached as Annex I to this Policy and send it to the Compliance Committee. For an entity to be considered reliable, it must comply with all the legal requirements established in the compliance questionnaire and at least one of the voluntary requirements.
- No donations will be offered or made without the prior, written assessment of the Compliance Committee and subsequent express consent of the Management Body.

¹ The compliance questionnaire is adapted to Spanish legislation and must be complemented with the requirements of local legislation in case the donation is made in another jurisdiction.

- Charitable donations will be offered in an open and transparent manner.

This Policy recognises the right of the members of the organisation to make charitable donations on a personal basis. Such donations are permitted provided that it is perfectly clear that the person making the donation does not represent the Company in doing so and that the donation does not involve Company resources.

- **Political contributions**

Political contributions are strictly prohibited.

This Policy recognises the right of the members of the organisation to make political contributions on a personal basis. Such contributions are permitted provided that it is perfectly clear that the person making the contribution does not represent the Company in doing so and that the contribution does not involve Company resources.

- **Sponsorship activities**

Sponsorship activities will be reasonable, in good faith or directly related to the promotion, demonstration or explanation of the installations of the Company, its plans, assets or services.

Sponsorship activities will respect the following rules:

- Sponsorship activities will be subject to the prior, written assessment of the Compliance Committee and subsequent express consent of the Management Body.
- Partners linked by sponsorship activities will be well-known, trustworthy and have an excellent reputation.
- Sponsorship will be offered in an open and transparent manner.

- **Suppliers, advisors and business partners**

Conclusion of any agreements with suppliers, advisors and business partners, in operations or transactions somehow involving a public administration, body or

company, public or private, whether Spanish or foreign, will be in line with the strictest requirements derived from due diligence.

Where possible, the suppliers, advisors and business partners chosen will be well-known, prestigious companies.

Due diligence mechanisms will be established to achieve the best possible knowledge of the persons intervening as suppliers, advisors and business partners so that it will be possible to hire the most suitable to perform the activity in an ethical manner and without giving rise to economic harm or reputational risks for Iridium.

Suppliers, advisors and business partners will be informed -with a documentary record thereof- of all the prohibitions that Iridium has established with regard to corruption and asked to state that they are aware of such prohibitions and undertake to strictly comply with them. These prohibitions will be included, where possible, in express and specific form in any agreements signed with suppliers, advisors and business partners.

In those cases in which there may be doubts regarding the destination or nature of the expenses to be incurred, suppliers, advisors and business partners will inform Iridium and obtain its authorisation for incurring the same.

- **Accounting records**

Iridium requires that an appropriate system of accounting control be maintained and that all transactions are reported and reflected appropriately and precisely and in reasonable detail in the Company's accounting books and records, meaning that the accounting books will not contain false or misleading records or statements. Precise, appropriate and reasonable detailed documentation will be maintained in relation to all transactions and documents will be stored in accordance with the terms of accounting legislation.

All financial operations will at least:

- Be authorised in accordance with the Iridium rules on the approval of expenditure.

- Be recorded in accordance with the International Financial Reporting Standards, Generally Accepted Accounting Principles and the Internal Fiscal Control Rules approved by the Management Body of Iridium.
- Be revised periodically in order to identify and correct any accounting discrepancy, error or omission.

6. TRAINING AND COMMITMENT

Iridium will promote proper training of the members of its organisation to ensure they are familiar with its ethical principles, as well as the duties and principles governing actions derived from the Code of Conduct and this Anticorruption Policy.


Specifically, annual anticorruption training will be held for persons who are particularly exposed, for the internal audit team and for the members of the legal advisory team with international responsibilities or responsibility for mergers and acquisitions of assets. Where possible, the training will be face-to-face.

Moreover, persons who are particularly exposed will have to sign an annual certificate affirming their abidance by the anticorruption legislation and that they are not aware of any transgression of the same in the last year.

7. BREACHES

This Policy is a mandatory norm meaning that any breach thereof will constitute an infringement and Iridium will adopt the appropriate disciplinary measures in line with labour legislation and the sanctions envisaged in the Collective Agreement for the Construction Sector in force, notwithstanding any other responsibility the person committing the infringement may have. Likewise, Iridium will reserve the right to adopt the measures it deems appropriate against business partners who fail to comply with it.

Any employee or third party who is aware of or has well-founded suspicion of a breach of this Policy will report it using the Ethical Channel, available on the intranet and on the Iridium website. This channel is both a route for reporting breaches of the rules set out in this Policy, and a means for the resolution of queries that the application of the same may give rise to. Iridium will adopt the measures necessary to avoid adverse consequences derived from communications made in good faith by members of the organisation according to the terms set out herein. Strict confidentiality will be maintained in relation to the identity of persons sending communications or reporting breaches via the Ethical Channel.

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8. ENTRY INTO FORCE AND REVIEW

The general principles of this Policy will enter into force as of approval by the Management Body of Iridium.

The Compliance Committee will revise the content of this Policy periodically in order to ensure that it contains the recommendations and best practice in force at any given time and will propose any amendments and updates that contribute to the development and continuous improvement of the same to the Management Body.

ANNEX I ANTICORRUPTION POLICY ED. 3**COMPLIANCE QUESTIONNAIRE
CHARITABLE DONATIONS**

Date:

Foreign Entity National Entity *(Mark with X as appropriate)***1.- CORPORATE DATA**TAX No COMPANY NAME (Tax Name) Address Location ZIP CODE

Do you have any regional or national registry? YES NO *(e.g.: National or Regional Register of Foundations; National or Regional Register of Associations; Non-Governmental Development Organisations Register).*

If YES, which one?

2.- LEGAL REQUIREMENTS

DOES THE ENTITY MAKE PUBLIC ITS ORGANISATIONAL STRUCTURE AND ALL PUBLIC GRANTS RECEIVED AS WELL AS SIGNED AGREEMENTS ?

 YES NO

COMMENTS

DOES THE ENTITY SUBMIT THE EXTERNAL AUDIT OF ITS ANNUAL ACCOUNTS WITH THE CORRESPONDING PROTECTORATE OR DEPOSITORY OF ACCOUNTS OF THE RELEVANT ASSOCIATIONS?

 YES NO

COMMENTS

3.- VOLUNTARY REQUIREMENTS (*must comply with at least 1*):

DOES THE ENTITY SUBMIT ITS ANNUAL REVIEW TO THE SPANISH AGENCY FOR INTERNATIONAL DEVELOPMENT COOPERATION IN COMPLIANCE WITH ITS RATING REGULATIONS? YES NO

DOES THE ENTITY REPORT TO THE EUROPEAN COMMISSION HUMANITARIAN OFFICE (ECHO)? YES NO

DOES IT FULLY COMPLY WITH THE NINE PRINCIPLES AND GOOD PRACTICES OF THE LOYALTY FOUNDATION? YES NO

DOES THE ENTITY HAVE AN EXTERNAL AUDIT REPORT WHICH SATISFACTORILY ENDORSES THE TRANSPARENCY AND GOOD GOVERNANCE TOOL OF THE ONGD COORDINATOR (CONGDE)? YES NO

COMMENTS

