

Compliance Policy

At GRUPO DIAL, aware of the importance of regulatory compliance and of the legal responsibilities arising from the activities we carry out, we have decided to implement a Compliance Manual setting out the policies and procedures aimed at achieving the highest possible level of compliance.

To this end, GRUPO DIAL will promote good practices and a Compliance culture that ensures adherence to the established policies and procedures, committing ourselves to:

- Establish a documented system to ensure the traceability of all our activities and, as far as possible, compliance with applicable legislation.
- Appoint a Compliance Body with the authority and independence required to perform the tasks of the Compliance System.
- Achieve the highest level of regulatory compliance and continuously improve the effectiveness of the Compliance System.
- Identify, assess and minimise the Compliance risks to which the organisation is exposed.
- Provide adequate infrastructure and the means and resources necessary to achieve the established objectives, including the human and financial resources required for effective supervision, monitoring and control of the Compliance System.
- Prohibit the commission of criminal acts by any member of the organisation, including the Governing Body, as well as by Business Partners.
- Prohibit entering into contracts, agreements or arrangements that are not duly recorded in writing.
- Promote continuous training for all personnel in the organisation.
- Continuously analyse information concerning our customers and suppliers in order to prevent incidents and improve the services provided by GRUPO DIAL.
- Ensure consultation with and participation by the organisation's personnel.

- Establish the obligation to report possible unlawful or suspicious conduct. For this purpose, a reporting channel will be available (cumplimiento@grupodial.es or through the section provided on our website www.grupodial.es), guaranteeing confidentiality. An environment free from retaliation, discrimination or disciplinary sanction is guaranteed for good-faith reporting of violations or well-founded suspicions of violations of the Compliance Policy, or for refusing to participate in criminal conduct, even if this results in a loss of business for the organisation.
- Establish achievable objectives consistent with the Policy that serve to define the direction in which GRUPO DIAL's efforts should be focused.
- Integrate our suppliers and subcontractors into the Compliance System.

The Compliance System must be maintained in such a way as to work on preventing deficiencies in the system.

These principles serve as a reference for establishing objectives and targets through which the effectiveness of the Compliance System can be continuously improved.

This commitment is the responsibility of each and every person on the GRUPO DIAL workforce and is communicated to all of them for their knowledge, understanding and compliance, and is available to anyone who requests it.

Failure to comply with the provisions of this Policy is subject to the disciplinary regime established in the applicable Collective Bargaining Agreement.

A Coruña, 3 June 2025