



KYC and Third-Party Due Diligence Procedure

Code: CMP-DD-PR-01

Document title: KYC and Third-Party Due Diligence Procedure

Version: V1

Approved on: 28/11/2025

Date of entry into force: 11/12/2025

Area responsible: Global Compliance Committee

Scope: Global

Document status: In force

Approved by: Board of Directors

Internal Regulatory Framework

These regulations are issued as a development and complement to section 6 of the Code of Ethics (CMP-ET-MC-01) and the Anti-Bribery and Anti-Corruption Policy (CMP-AB-PO-01) and the Public Procurement Policy (CMP-AB-PO-03), to ensure that the guiding principles of these policies stay aligned with SEIDOR's relations with clients, suppliers and associates to prevent corrupt or improper practices, while also offering a definition of the requirements relating to contracting and relations with third parties. All of this is aimed at reinforcing SEIDOR's institutional commitment to the highest standards of integrity, establishing a policy of **zero tolerance for any form of bribery, corruption or misconduct**.

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1. Purpose

To guarantee regulatory compliance, prevent legal and reputational risks, and ensure transparency and compliance with ethical and legal principles, SEIDOR has approved this KYC and Third-Party Due Diligence Procedure (the “**Procedure**”) based on international standards, which is applicable to all companies in the SEIDOR group, regardless of their line of business or region, and it is mandatory for all employees, managers, directors, business partners and any third parties acting for and on behalf of SEIDOR.

The ultimate aim of the Procedure is to obtain adequate knowledge of the Third Parties with which SEIDOR deals, to stop, avoid or mitigate any adverse impact.

For these purposes, the term **Third Party** includes clients, suppliers, subcontractors, agents, associates, business partners (including joint venturers or temporary joint venturers), and, in general, any company/entrepreneur involved in SEIDOR’s value chain.

The process of identifying, assessing and evaluating the Third Parties with which SEIDOR has relations, in terms of corruption, fraud, national or international commercial or administrative sanctions and similar risks described in this Procedure, is independent of any other analysis that may be carried out with Third Parties from an operational, commercial, financial or any other point of view.

To ensure uniform and consistent interpretation, and to facilitate the understanding of all the documents that make up the Integrated Compliance Management System, capitalised terms in this Procedure have the meaning attributed to them in the Code of Ethics (CMP-ET-MC-01), except for those that have an express definition attributed to them in this Procedure.

2. Scope

This Procedure must be complied with by all Employees and Associates and any third parties acting on behalf of SEIDOR.

Where there are specific versions or developments of this Procedure arising from geographical or corporate particularities, those versions will also be binding within the scope determined in them.

3. Regulatory framework

This Procedure develops the principles and guidelines contained in:

- Code of Ethics (CMP ET MC 01).
- Criminal Risk Prevention Manual (CMP RK MC 02).
- Public Procurement Policy (CMP AB PO 03).
- Anti-Bribery and Anti-Corruption Policy (CMP-AB-PO-01)
- Gifts, Hospitality and Courtesies Procedure (CMP AB PR 02).

All of the above regulations are available on the corporate intranet or equivalent in each country.

4. Guiding principles

- SEIDOR will not enter into commercial relations with any Third Party without first having carried out the identification, analysis and evaluation process provided for in this Procedure.
- SEIDOR will carry out an identification, analysis and assessment of the Third Parties with which it has business relations, in terms of corruption, fraud, national and international commercial or administrative sanctions, and reputation.
- The application of the Procedure established here will follow the principles of reasonableness and proportionality and will have different levels depending on the Third Party's relationship with SEIDOR, whether by business volume, sector or market risk or other elements.
- SEIDOR will not initiate or maintain business relations with Third Parties for whom the due diligence process provided for here yields risk results in any of the conducts prohibited by the Code of Ethics (CMP ET MC 01), the Anti-Bribery and Anti-Corruption Policy (CMP-AB-PO-01) and the Public Procurement Policy (CMP AB PO 03).
- SEIDOR will not enter into or maintain business relationships with Third Parties engaged in the production, distribution or financing of controversial weapons falling into any of the following categories: anti-personnel mines, biological weapons, chemical weapons, nuclear weapons, cluster munitions and incendiary weapons (such as Napalm) or any others prohibited by applicable law.
- SEIDOR will not maintain commercial relations with Third Parties if they are not duly documented in a written contract, acceptance of offer or standard terms of business, and do not respond to an identifiable, verifiable and traceable service, which must be invoiced and charged in accordance with the terms and conditions previously agreed in each case.

5. Controls. Procedure.

5.1. Identification

The process begins with SEIDOR's Purchasing Department identifying and verifying the identity of the Third Party and the activity it carries out. This identification requires obtaining at least the following information:

5.1.1. Legal entities:

- Deed of incorporation and current articles of association of association, or equivalent documentation.
- Power of attorney of the legal representative, and identity card of the legal representative, both in force.
- Certificate/statement of significant control, indicating the persons with significant control, their identity, nationality and residence.
- The group to which it belongs, with an indication of the nationality and residence of the parent company of the Group.
- Tax identification number.
- Internal compliance policy.

5.1.2. Natural persons or individuals:

- Current identity card, indicating nationality and place of residence.

The forms to be completed depending on whether the Third Party is a natural person or a legal entity, together with the documentation to be included in each case, are attached as **Annex I** and **Annex II**.

Likewise, the Third Party must complete and sign a Statement of Compliance or, where applicable, accept a contractual clause (i) accepting and agreeing to comply with the commitments of integrity, transparency and zero tolerance required by SEIDOR in its Code of Ethics, and adhering to that code; (ii) representing that the training and documentation provided to SEIDOR in compliance with this Procedure is accurate, correct and current, and agreeing to inform SEIDOR of any changes in this regard. In the particular case of Third-Party Clients, this Statement of Compliance may be replaced by a contractual clause in which the Client (i) represents that it knows, accepts and will comply with SEIDOR's Code of Ethics, which will form an integral part of the contract signed with the Client; and (ii) agrees to inform SEIDOR of any conflict of interest with SEIDOR and related persons.

5.2. Checks against lists of risks

It must be verified whether the Third Party is on any of the public lists of terrorists and sanctioned persons (OFAC, EU, UN, IDB, WORLD BANK) or is a person with public or politically exposed responsibility.

For these purposes, a Politically Exposed Person ("PEP") is an individual who holds or has held prominent public office domestically or abroad, or who is closely associated with someone who holds such office, such as family members or close associates. This category includes both nationals and foreigners, and members of international organisations.

For example, PEPs are considered to be senior government officials, senior judicial officials, managers of state or parastatal companies, high-ranking military officers or members of political parties with relevant positions.

5.3. Assessment of jurisdiction

It should be verified whether the Third Party operates in any of the countries considered high risk or under heightened scrutiny by the Financial Action Task Force (FATF). This body periodically updates the list of countries considered high risk and those that should be subject to greater vigilance, to identify those jurisdictions that have not implemented the necessary measures to protect the integrity of their financial sector and, therefore, have greater risks in terms of AML/CFT. For illustrative purposes, Annex III includes the list of risk territories and jurisdictions drawn up by the FATF and in force at the date of approval of this Procedure. SEIDOR will periodically update this list.

The legal and regulatory framework in the country of origin should also be assessed.

5.4. Reputational review

Information regarding the reputation of the supplier, client, associate or third party should be checked in public media and open sources.

All the information obtained in accordance with the previous sections must be duly documented and recorded in the corresponding file.

5.5. Risk assessment

In accordance with international standards, SEIDOR applies the following criteria to classify a Third Party's risk:

LOW: meets the following criteria	MEDIUM: has one of the following defects	HIGH: has one of the following defects
<ul style="list-style-type: none"> Submitted complete and updated documentation. Operates in FATF low risk jurisdictions No history of relevant sanctions, investigations or litigation Not a PEP or linked to PEPs Has compliance and business ethics policies in place Solid and verifiable reputation 	<ul style="list-style-type: none"> Incomplete or unclear documentation Operates in countries with moderate risk or regulatory deficiencies Has indirect links to PEPs or sanctioned third parties Has no formal compliance policies in place but is willing to adhere to SEIDOR's policies Has had minor or no litigation related to white collar offences 	<ul style="list-style-type: none"> Has not provided information or refuses to cooperate in this procedure Operates in FATF high-risk jurisdictions Directly or indirectly linked to PEPs or sanctioned persons Record of serious administrative sanctions, or convicted of corruption, fraud, money laundering Unstable or unclear financial situation

The initiation of commercial or business relations with natural or legal persons identified as medium risk is the responsibility of the local Compliance Officer or Local Compliance Committee (or the equivalent figure in the jurisdiction concerned), without whose authorisation no commercial or business relations may be entered into with such persons. In the light of the documentation and information gathered, the local Compliance Officer or Local Compliance Committee (or the equivalent in the jurisdiction concerned) may decide to apply enhanced due diligence measures, and any ongoing monitoring measures they consider appropriate.

SEIDOR will not enter into commercial or business relations with any individual or legal entity identified as high risk without the prior approval of the Global Compliance Committee, which will determine the application of the appropriate enhanced due diligence measures on a case-by-case basis, and stricter, more frequent and continuous control and monitoring.

5.6. Monitoring and updating

Periodically and depending on the risk of the Third Party, the information available from the Third Party must be reviewed to verify whether they continue to be suitable candidates to maintain business relations with SEIDOR or, on the contrary, whether it is necessary to (i)

suspend the relationship as long as the standards required by SEIDOR are not met; (ii) terminate the relationship; or (iii) implement measures to reduce negative impacts.

For these purposes, SEIDOR's contracts with Third Parties must include the compliance and audit clauses and the contractual termination clauses that SEIDOR deems appropriate in each case.

6. Training and communication

SEIDOR will promote the continuous and regular training of all Employees and Associates in KYC and Third-Party Due Diligence, ensuring that Employees and Associates have the necessary knowledge, skills and awareness to act in accordance with the highest ethical standards and the principles of this Procedure.

This Procedure will be actively disseminated and made publicly available through the corporate intranet or equivalent in each country, ensuring that it is known and understood by all Employees and Associates. It may also be incorporated into contracts or agreements with strategic partners and suppliers, reaffirming a shared commitment to transparency and business integrity.

Attendance at these training sessions will be compulsory for Employees.

Annually, the Global Compliance Committee will prepare a report containing (i) the dates of the training sessions; (ii) the contents, materials and duration of the training sessions; (iii) the attendees of the training sessions carried out; and (iv) the results of the assessments carried out among the attendees regarding the content of the training.

Employees may submit any queries they may have regarding the application of this Procedure to the Global Compliance Committee and/or the local Compliance Officer or Local Compliance Committee (or the equivalent in the relevant jurisdiction).

7. Oversight, monitoring and review

The Global Compliance Committee will be responsible for overseeing the proper implementation, compliance and effectiveness of this Procedure, ensuring that its principles are integrated at all levels of the organisation.

Its duties include carrying out regular audits and controls, preparing follow-up reports for senior management and proposing corrective or improvement actions if deviations or risks of non-compliance are detected.

Furthermore, this Procedure must be reviewed by the Global Compliance Committee at least once a year, or whenever relevant regulatory, structural or operational changes occur that may affect its scope or application. These reviews will be formally documented and their findings will serve as a basis for updating this Procedure and the other documents of the Integrated Compliance Management System. SEIDOR will promote continuous improvement according to the Plan Do Check Act cycle.

8. Consequences of violations

Any violations of this Procedure or any related procedures will be subject to formal and documented investigation, in accordance with the mechanisms established in the Disciplinary Procedure for Violations (**CMP-DC-PR-05**) and other internal SEIDOR regulations.

These violations may lead to the imposition of disciplinary measures proportional to the seriousness of the facts, including the labour, civil or criminal sanctions provided for in the legislation in force.

In addition, the Global Compliance Committee must ensure that any incidents are assessed objectively, the actions taken are documented and corrective measures aimed at preventing future violations are implemented.



This Protocol must be reviewed periodically and whenever relevant regulatory, structural or operational changes occur that may affect its scope or application. These reviews will be formally documented and their findings will serve as a basis for updating this Protocol and the other documents of the Integrated Compliance Management System. SEIDOR will promote continuous improvement according to the Plan Do Check Act cycle.

9. Document control and approval

This Procedure was approved by SEIDOR's Governing Body on 28 November 2025 and forms part of the Seidor Group's Integrated Compliance Management System as document **CMP DD-PR-01**.

Version control:

Version	Date	Description of change	Manager	Approved by:
1.0	28/11/2025	KYC and Third-Party Due Diligence Procedure	Compliance Area Global Corporate	Board of Directors

<p>On behalf of the Board Sergi Biosca Arpa</p> 	<p>The head of the Global Compliance Committee Ainhoa Santamaría Benito</p> 
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Annex I

KYC Form for natural persons

1. PERSON RESPONSIBLE FOR FILLING OUT THE FORM			
Area		Manager	
Description of the service/product/supply			
Date			
KYC activity			
KYC for source of funds Third party/transaction			
Signature			

2. DETAILS OF THE NATURAL PERSON	
First and last names	
National identification number	
Nationality	
Place of residence	
Politically Exposed Person (if applicable, indicate position)	
Address	
Telephone no.	
Email	
*Bank account certificate	

* Request a copy of the document.

IMPORTANT: Check the list of risk jurisdictions. If the Third Party is a national or resident in a risk jurisdiction, enhanced due diligence measures apply.

Only to be completed for clients acting through a representative:

2.1. DETAILS OF THE REPRESENTATIVE NATURAL PERSON	
First and last names	
Nationality	
Place of residence	
Telephone no.	
Address	
KYC Representative Activity:	
*ID No. and document accrediting representation	

* Request a copy of the ID document and the document accrediting representation.

IMPORTANT: Check the list of risk jurisdictions. If the representative is a national or resident in a risk jurisdiction, enhanced due diligence measures apply. jurisdiction, enhanced due diligence measures apply.

Annex II

KYC Form for legal persons

1. PERSON RESPONSIBLE FOR FILLING OUT THE FORM			
Area		Manager	
Description of the service/product/supply			
Date			
KYC activity			
KYC for source of funds Third party/transaction			
Signature			

2. DETAILS OF THE LEGAL PERSON	
Company name	
National identification number	
Nationality	
Registered office	
Corporate group	
*Incorporation	
Corporate purpose	
Corporate website	
Email	
*Published internal compliance policies yes/no	

apv	
*Bank account certificate	

* Request a copy of the document.

IMPORTANT: Check the list of risk jurisdictions. If the Third Party is a national or resident in a risk jurisdiction, enhanced due diligence measures apply.

2.1. DETAILS OF THE REPRESENTATIVE LEGAL PERSON

First and last names	
Nationality	
Place of residence	
Telephone no.	
Address	
KYC Representative Activity:	
*ID No. and document accrediting representation	

* Request a copy of the ID document and the document accrediting representation.

IMPORTANT: Check the list of risk jurisdictions. If the representative is a national or resident in a risk jurisdiction, enhanced due diligence measures apply.

3. PERSON WITH SIGNIFICANT CONTROL

Shareholding and control structure:

If the person with significant control is a legal person, the natural person who ultimately controls the legal person must be identified

Person(s) with significant control:

First and last names Stake %			ID no.	
Nationality		Residence:		
First and last names Stake %			ID no.	
Nationality		Residence:		
First and last names Stake %			ID no.	
Nationality		Residence:		

IMPORTANT: Check the list of risk jurisdictions. If the representative is a national or resident in a risk jurisdiction, enhanced due diligence measures apply..

Annex III

RISK TERRITORIES AND JURISDICTIONS October 2025 (Subject to continuous updating)

1. Jurisdictions identified as “high risk” by FATF:

- Democratic People’s Republic of Korea
- Iran
- Myanmar

2. Jurisdictions under enhanced FATF surveillance

- Algeria
- Angola
- Bolivia
- Bulgaria
- Burkina Faso
- Cameroon
- Ivory Coast
- Haiti
- British Virgin Islands
- Kenya
- Lebanon
- Monaco
- Mozambique
- Namibia
- Nepal
- Nigeria
- Democratic Republic of the Congo
- Lao People’s Democratic Republic
- Syria
- South Africa
- South Sudan
- Venezuela
- Vietnam
- Yemen



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