



# Competition Compliance Policy

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## 1. INTRODUCTION

ENAIRe, a state-owned company of the [Ministry of Transport and Sustainable Mobility \(MITMS\)](#), is responsible for the planning, management, coordination, operation, maintenance and administration of air traffic, telecommunications and aeronautical information services, as well as of the communications infrastructure, facilities and networks of the air navigation system, with the aim of ensuring that the service is provided safely, efficiently, continuously and sustainably.

As a demonstration of its commitment to a [culture of ethics and regulatory compliance](#), ENAIRe approves this [Competition Compliance Policy](#), framed within the [ENAIRe's Governance and Management Model](#), as part of the [ENAIRe's Ethics and Regulatory Compliance Management System](#).

This [Competition Compliance Policy](#) reinforces the [culture of ethics and regulatory compliance](#) and the [Ethics and Regulatory Compliance Management System of ENAIRe](#), as well as the [commitment of the Governing Board and the CEO](#) as representatives of Senior Management [to the organisation's purpose, values, and ethical principles](#) and the express prohibition of any behaviour that contravenes the applicable laws on fair competition or ENAIRe's regulations, values, and principles.

This [Policy](#) sets out the general principles on [Good Governance, Ethics and Compliance with Competition Laws](#), which must guide the development of ENAIRe's strategy and activities and provide the reference framework for establishing the [objectives of ENAIRe's Compliance with Competition Laws](#).

## 2. PURPOSE AND SCOPE

### 2.1. Purpose

This [Policy](#) aims to lay out the [general principles and commitments of ENAIRe](#) in terms of [Good Governance, Ethics, and Compliance with Competition Laws](#), serving as a guide for all ENAIRe personnel and others subject to this [Policy](#), without prejudice to other specific policies in place.

This [Policy](#) promotes and consolidates ENAIRe's [culture of ethics and compliance with competition laws](#), reinforcing and spreading [the organisation's commitment to the express prohibition of any behaviour that constitutes an illegal act or contravenes the applicable free competition laws or ENAIRe's regulations, values, and principles](#).

This [Policy](#) fosters a [culture](#) that encourages the development of [professional conduct marked by integrity and diligence](#), and [firmly rejects the commission of any illegal act involving free competition, which may in no case be justified based on potential benefits to the Entity](#).

### 2.2. Subjective scope of application

This [Policy](#) applies to ENAIRe and is mandatory for members of the Governing Board and Management Committee, as well as for the rest of the company's governing and management bodies and for each and every one of the people working at ENAIRe, both in the performance of their duties and in their interactions with third parties, regardless of their association or position within the company (all of them, hereinafter, the "[Personnel](#)").

Similarly, persons acting on behalf of and representing ENAIRe without being part of its organisation will undertake to act in accordance with this [Policy](#) when representing the Company or acting on its behalf in the performance of their duties.

### 2.3. Objective scope of application

This [Policy](#) applies to all activities carried out by ENAIRe that are exposed to risks relating to free competition.

## 3. OPERATING PRINCIPLES AND COMMITMENTS

The basic operating principles and commitments on which this [Policy](#) is based are detailed in the [Code of Ethics](#) and below.

The [Code of Ethics](#) is based on ENAIRe's ethical purpose, values and principles.

These [principles](#) are in keeping with ENAIRe's commitments in the areas of Good Governance, Ethics, and Compliance in matters of free competition, which are set out below:

- **Zero tolerance for conduct that may lead to the commission of criminal or administrative violations in matters of free competition.**
  - **ENAIRe prohibits the commission of criminal acts and of administrative violations involving free competition**, which is why ENAIRe, and especially its Governing Board and CEO, as representatives of Senior Management, will act and demand that actions always be in line with the applicable laws, the Code of Ethics, internal policies, and ENAIRe's Ethics and Regulatory Compliance Management System.

**No ENAIRe employee is authorised to ask another employee to commit an act that is illegal or that violates the provisions of the Ethics and Regulatory Compliance Management System. Acting on the instructions of a superior, or for the potential benefit of ENAIRe, shall not justify non-compliance.**
- **Compliance with ENAIRe's Code of Ethics and with its obligations in matters of free competition**, as well as with applicable legal and regulatory requirements, internal regulations, and voluntarily assumed obligations.
- **The promotion of a culture of ethics and compliance**: behavioural ethics and professional integrity are essential pillars of ENAIRe's management of its business activity. In this regard, integrity, ethics, honesty, trust and transparency must guide decision-making and other actions at ENAIRe. The promotion of this culture relies on ENAIRe's communication, outreach and training plans in these areas.
- **Professional and ethical conduct**: all actions taken by ENAIRe personnel must be based on integrity, professionalism, and good faith, assuming responsibility at all times for their actions and decision-making.
- **Institutional respect and reporting transparency**: ENAIRe commits to respecting public institutions and bodies, as well as to the transparency and veracity of the information published, which must be adequate, useful and reliable regarding its performance and actions.
- **Impartiality and absence of conflict of interest**: the principles of impartiality and objectivity must be present in ENAIRe's internal relationships and with third parties; therefore, its personnel will always act in accordance with these principles, refraining from participating and taking decisions in matters where they face a conflict of interest, maintaining an independent criterion free from any external pressure or personal interest.
- **Respect for ENAIRe's image and reputation**: the image and reputation of ENAIRe are valuable assets that contribute to the perception of the Entity as acting with integrity and respect towards the market and its stakeholders. That is why its personnel must pay maximum attention and exercise due diligence to preserve ENAIRe's image and reputation in all their professional activities and relationships with third parties.
- **Excellence and continuous improvement**: ENAIRe will ensure the proper implementation and improvement of this [Policy](#) and the [Ethics and Regulatory Compliance Management System \(SGECN\)](#), adapting to the organisational context and the needs of ENAIRe and its relevant

stakeholders, subject to standards of excellence and continuous improvement where objective and rigorous performance evaluation and an efficient, independent system for reporting directly to the CEO and the Governing Board enable the adoption of corresponding improvement actions that allow the SGEEN to evolve and progress.

## 4. STANDARDS OF CONDUCT

The [Ethics and Regulatory Compliance Management System](#) includes measures designed to assess the **risks relating to free competition**, and to prevent, detect, and manage them at an early stage.

ENAIRe personnel must act at all times in compliance with free competition laws. Accordingly, they must commit to:

- **Refraining from adopting or entering into any type of agreement, decision, or collective recommendation whose object or effect is to prevent, restrict, or distort competition.** This includes entering into agreements, arrangements, or alliances, or participating in national or international public procurement procedures, that undermine free competition.
- **Not abusing a dominant position in the market.** The law assigns companies in a dominant position a role of special responsibility.
- **Treating competition-sensitive information confidentially** and respecting their own and third parties' business and trade secrets, as well as any other information of a sensitive nature that could affect the market or consumers.
- **Not engaging in misleading advertising, nor conveying or omitting information that does not accurately reflect the reality of the services and/or that may mislead.** This includes advertising services through different media for the purpose of making false statements about the services offered in order to mislead or to obtain a relevant position in the market to the detriment of competitors.
- **Not making statements about a competitor's activity, products, or services that could damage that competitor's reputation in the market.** This includes acts of disparagement regarding the activities, products, or services of competitors with the intent to damage their market reputation, as well as comparative acts intended to highlight one's own services through misleading information when comparing them with competitors' services, thereby affecting their reputation.
- **Cooperating with maximum transparency with national, EU, and international competition authorities in any type of investigation.** This includes the prohibition of obstructing inspections, disobeying the inspector, failing to provide requested information, destroying evidence, or breaching or contravening the provisions of any previously adopted decision, agreement, or commitment.

Failure to comply with competition law can result in severe sanctions for both the organisation and its employees.

## 5. POSSIBLE CONSEQUENCES OF BREACHING COMPETITION LAW

**Administrative sanctions on infringing entities.** The European Commission, the Spanish National Commission on Markets and Competition, and regional competition authorities have the power to impose fines on companies or entities that participate in competition law infringements (TFEU or the Spanish Competition Act). Very serious infringements may be subject to fines of up to 10% of the total turnover of the preceding financial year.

**Individual sanctions for directors and legal representatives of infringing entities.** Directors of infringing companies may be fined personally. Individual fines are in addition to those imposed on the entities, and can cause significant reputational damage to the affected director.

**Compensation for damages.** Those harmed (competitors, business partners, consumers, users, etc.) may claim compensation for damages suffered as a result of the anti-competitive conduct of the infringing entity. In some cases, these compensatory claims exceed by far the amount of administrative fines.

**Nullity of contracts.** Competition law provides for the nullity of agreements that contravene competition rules, which may jeopardise relationships with third-party companies and other market operators.

## 6. GOVERNANCE OF COMPLIANCE IN COMPETITION LAW

The Governing Board of ENAIRe is ultimately responsible for implementing and improving the Ethics and Compliance Management System (SGECN) and for promoting and fostering an ethical and compliance culture regarding competition law at ENAIRe.

The Governing Board of ENAIRe designates the **Compliance Function of ENAIRe**, which includes the **Regulatory Compliance Office**, members of the **Ethics and Compliance Committee**, and the **Manager of the Internal Reporting System**.

The Governing Board and the CEO, as representatives of Senior Management, as evidence of their leadership and commitment to the **culture of ethics and regulatory compliance**, must ensure that the following **principles regarding the Compliance Function** are implemented:

- **direct access** to the Governing Board,
- **independence**,
- **the appropriate authority and competence**.

## 7. ROLES AND RESPONSIBILITIES

### 7.1. The function of regulatory compliance

The **Regulatory Compliance Function**, as the guarantor of the **Ethics and Regulatory Compliance Management System (SGECN)**, is responsible for the supervision, monitoring, and control of the System, whose responsibilities include the following:

- continuously promoting and monitoring the implementation and effectiveness of the System;
- identifying and managing risks related to free competition;
- ensuring that ENAIRe personnel receive continuous training and have access to the System's resources;
- promoting the inclusion of competition compliance responsibilities in job descriptions and performance management processes for ENAIRe personnel;
- establishing performance indicators and measuring the performance of the SGECN;
- analysing and evaluating the performance of the SGECN to identify the need for any corrective actions;
- implementing a system for recording and documenting compliance with competition law;
- ensuring that the SGECN is reviewed at planned intervals, including **internal audits** and **management review**;
- ensuring that an Internal Reporting System is implemented in the organisation and that reports are processed;

- informing the Governing Board and the CEO, as representatives of Senior Management, of the results of the implementation of the SGE CN.

The Compliance Function consists of the following bodies:

### **7.1.1. Manager of the Internal Reporting System**

The Governing Board appointed the Secretary General and Director of Compliance of ENAIRe as the manager of ENAIRe's Internal Reporting System, effective from 13 June 2023.

The persons included in the scope of this [Policy](#) are required to cooperate with the manager of the system under the terms of this [Policy](#) and any implementing rules.

The appointment and removal of the system's manager will be reported to the Independent Authority for the Protection of Whistleblowers (A.A.I.), or, where applicable, to the competent authorities or bodies of the autonomous communities, within ten working days.

The powers and responsibilities of the manager of the Internal Reporting System are as follows:

- Ensuring the confidentiality of the identity of anyone who uses the Ethics Channel and chooses to identify themselves. The identity of the whistleblower who reveals their identity will not be disclosed without their consent.
- Engaging in secure communications with the whistleblower, using the Ethics Channel tool or any other means that may be enabled for this purpose, as required by the circumstances.
- Ensuring that the processing, oversight and resolution of communications is made in accordance with the principles and guarantees provided for in the laws and in [ENAIRe's Internal Reporting and Whistleblower Protection System Policy](#); and in general, in accordance with the applicable laws, acting with full independence and impartiality.
- Reporting biannually to the Ethics and Compliance Committee (CECN) and the CEO of ENAIRe, and annually to the Governing Board regarding any information required involving the activities of the System, while preserving the confidentiality and security of the information, as well as the other guarantees and rights of the whistleblowers.
- The manager of the system may immediately and directly inform the Governing Board of any significant issues.
- Update the Log Book with information on any reports received.

### **7.1.2. Ethics and Regulatory Compliance Committee (CECN)**

ENAIRe's Governing Board has appointed the Ethics and Regulatory Compliance Committee (CECN), granting it [independence, authority, and competence](#). This collegiate body thus has the freedom to act without any interference from the chain of command, has a voice to defend and raise any issues related to ethics and compliance, and has adequate resources to fulfil its responsibilities regarding the [Ethics and Regulatory Compliance Management System](#).

The CECN has the full [support of ENAIRe's Governing Body](#), to which it has direct access. It also has access to other high-level decision-makers and the opportunity to contribute to the early stages of decision-making processes at all levels of the organisation, to all personnel, documented information, necessary data, and expert advice on applicable legislation and standards.

The CECN is made up of [a President, a Secretary, and between three to five members](#).

- The president of the CECN has a casting vote in the event of a tie. The presidency of this committee will be held by the person in charge of Regulatory Compliance.
- The secretary of the CECN has a voice but not a vote at the meetings. The secretary is the person responsible for the Governance functions. Ethics and Regulatory Compliance.



- The persons who hold the following positions are members of ENAIRe's CECN:
  - CFO;
  - Personnel Director;
  - Air Navigation Services Director;
  - Air Navigation Services Deputy Director;
  - Head of the Internal Audit Division.

The CECN is tasked with [promoting a culture of ethics and regulatory compliance in ENAIRe](#) and with ensuring that the [Ethics and Regulatory Compliance Management System of ENAIRe is established, implemented, maintained, and continuously improved, ensuring its effectiveness and appropriateness](#).

Its functions include:

- promoting a culture of ethics and regulatory compliance;
- promoting the proper use of ethical channels and guarantee protection against retaliation;
- establishing, implementing, maintaining, and continuously improving the Ethics and Regulatory Compliance Management System, ensuring its effectiveness and appropriateness;
- promoting the inclusion of competition compliance responsibilities in job descriptions, organisational roles, and corresponding processes;
- ensuring that competition compliance obligations are integrated into policies, processes, and procedures;
- keeping the ethics and regulatory compliance policies up to date;
- ensuring that competition risk assessments and their corresponding risk treatment plans are up to date and appropriate for the organisation;
- ensuring training of personnel in ethics and competition compliance;
- ensuring that organisational personnel and stakeholders have access to competition compliance resources, and that advisory support is provided to the organisation in this area;
- ensuring that performance indicators are established for the Ethics and Regulatory Compliance Management System;
- reporting on the Ethics and Regulatory Compliance Management System and its effectiveness to General Management and the Governing Board.

### 7.1.3. Directorate for Regulatory Compliance

This directorate is responsible for proposing the guidelines of the Ethics and Regulatory Compliance Management System, and is specifically tasked with matters of criminal compliance and compliance in the area of free competition.

## 7.2. Governing Board and CEO

The Governing Body and the CEO, as representatives of ENAIRe's senior management, must demonstrate [leadership and commitment to the Ethics and Regulatory Compliance System \(SGECN\) and to the organisation's culture of ethics and compliance](#) by:

- ensuring that competition compliance policies and objectives are established and aligned with the organisation's strategic direction;



- ensuring that the requirements of the Ethics and Regulatory Compliance Management System are integrated into business processes;
- ensuring that the Ethics and Regulatory Compliance Management System has the resources it needs;
- communicating the importance of effective ethics and competition compliance management in accordance with the requirements of the Ethics and Compliance Management System;
- ensuring that the Ethics and Regulatory Compliance Management System achieves the expected results;
- complying with and enforcing, both internally and externally, the [Competition Compliance Policy](#);
- directing and supporting people to contribute to the effectiveness of the Ethics and Regulatory Compliance Management System;
- promoting continuous improvement;
- helping other pertinent roles to demonstrate their leadership in their respective areas of responsibility;
- ensuring that an internal reporting system is established that satisfies the requirements of Law 2/2023 on whistleblower protection, and the requirements of the reference standards;
- ensuring that no member of the organisation is subject to any retaliation for reporting, in good faith, violations or reasonable suspicions of violations of a requirement, or for refusing to participate in actions that constitute a breach of [the Competition Compliance Policy](#), even if this leads to a loss of business for the organisation.

### 7.3. Management

Management must be responsible for competition compliance within its area of responsibility:

- cooperating with and supporting ENAIRe's Regulatory Compliance Function and encouraging employees to do the same;
- ensuring that all personnel under its supervision comply with the organisation's competition compliance obligations, policies, processes, and procedures;
- identifying and reporting competition law risks in its operations;
- integrating competition compliance obligations into business practices and procedures within its areas of responsibility;
- assisting with and supporting ethics and competition compliance training activities;
- raising staff awareness of competition compliance obligations and guiding them to meet training and competency requirements;
- encouraging personnel to raise competition compliance concerns and supporting them while preventing any form of retaliation;
- actively participating in the management and resolution of competition compliance incidents and issues;
- ensuring that once the need for corrective action is identified, the most appropriate corrective action is recommended and implemented.

### 7.4. ENAIRe staff

ENAIRe staff are responsible for:

- observing the organisation's competition compliance obligations, policies, processes, and procedures;
- reporting competition compliance concerns, issues, and breaches;
- collaborating with ENAIRe's Compliance Function with regard to the Ethics and Regulatory Compliance Management System;
- participating in training.

## 8. ELEMENTS OF THE ETHICS AND REGULATORY COMPLIANCE MANAGEMENT SYSTEM

To ensure the effectiveness and achievement of the [competition compliance objectives](#), the [Ethics and Regulatory Compliance Management System of ENAIRe](#), includes the following elements:

- **Governance and commitment of the Governing Board, and General Management as Senior Management:** to provide high-level leadership regarding the ethical and compliance culture. It is a fundamental pillar for the operation of ENAIRe's Ethics and Regulatory Compliance Management System
- **Code of Ethics:** approved by the Governing Board, it is ENAIRe's highest level internal standard. It expresses a firm commitment to the Purpose, Values, and Ethical Principles that define ENAIRe's ethical and compliance culture, consolidating the commitments to conduct that promote and encourage ethical and responsible behaviour by all affected individuals.
- **Competition Compliance Policy:** a top-level internal rule approved by the Governing Board that, inspired by the purpose, values, and principles of action set out in ENAIRe's Code of Ethics, reinforces the commitment to the company's values and **rejects and prohibits any behaviour that constitutes an unlawful act or violates the applicable laws involving free competition and ENAIRe's rules, values, and principles.**
- **The Regulatory Compliance Function:** is the set of bodies **responsible for the operation of the Ethics and Regulatory Compliance Management System and for ensuring that it is effective and appropriate**, as well as for **promoting a culture of ethics and compliance with competition laws** at ENAIRe.
- **Competition risk assessment methodology:** a procedure based on a set of parameters, criteria, and formulas through which the **competition risks** associated with ENAIRe's activities are evaluated and **controls** are established to minimise them.
- **Policies, procedures, processes, and other internal competition compliance regulations:** that make up the Ethics and Regulatory Compliance Management System of ENAIRe.
- **Training on ethics and competition compliance:** ENAIRe includes specific training on compliance with competition laws within its ethics and compliance training plan, intended for individuals within the organisation who are particularly exposed, including the Governing Board and the CEO, as representatives of senior management.
- **Internal Reporting and Whistleblower Protection System:** the **Governing Body of ENAIRe is responsible for implementing the internal reporting system, ensuring whistleblower protection and prohibiting retaliation.** The Governing Board designates the **Manager of the Internal Reporting System**, who will **diligently** manage communications received through the various channels that comprise the Internal Reporting System. These reporting channels comply with the provisions of the **Law 2/2023**, allowing the **whistleblower to anonymously, confidentially, and safely report any suspicious occurrence or behaviour involving risks pertaining to free competition.** Once the information is received, the corresponding proceedings

will be initiated, **guaranteeing confidentiality, protection of personal data and the absence of conflict of interest** at all times. If any non-compliance occurred that could constitute a criminal offence, ENAIRE will inform the competent authorities. ENAIRE will also promote collaboration with judicial and administrative bodies, and with national and international institutions and organisations in relation to the investigation of alleged criminal acts or other aspects that may be required of it.

- **Disciplinary regime:** Personnel are required to comply with external regulations, the Code of Ethics, and the organisation's policies and procedures. Corresponding disciplinary measures may be taken as needed. If individuals who violate this [Policy](#) are natural or legal persons who have a professional, administrative, commercial, or other type of relationship with ENAIRE (hereinafter referred to as "Third Parties"), the sanctions regime specified in commercial, civil, or other applicable regulations will apply.
- **Performance assessment and continuous improvement:** The Regulatory Compliance Function will ensure that all the monitoring, measurement, analysis, and evaluation elements are implemented to ensure that compliance goals involving free competition are met. It will rely on indicators, reports, internal audits, and management reviews, with a firm commitment to excellence and the continuous improvement of the suitability, adequacy, and effectiveness of the Ethics and Regulatory Compliance Management System to guarantee effectiveness and suitability.

## 9. OBLIGATION TO REPORT SUSPICIOUS ACTS OR CONDUCT RELATED TO COMPETITION RISKS

ENAIRE personnel are required to report any suspicious acts or conduct related to competition risks of which they become aware through ENAIRE's Internal Reporting System.

To the extent possible, this obligation must be imposed on Third Parties.

## 10. INTERNAL REPORTING SYSTEM OF ENAIRE

In compliance with the provisions of this [Policy](#), ENAIRE [makes available to whistleblowers](#), whether they are employees or third parties, [its Internal Reporting System](#), through which they can **report suspicious acts or behaviours related to risks involving free competition**, as outlined in the **scope** of [ENAIRE's Internal Reporting and Whistleblower Protection System Policy](#).

[ENAIRE's Internal Reporting System](#) can also be used to submit relevant questions or queries.

[ENAIRE guarantees the absence of retaliation](#) provided that the report was made in **good faith**, is within the **objective scope of application** and complies with the **protection conditions laid out in Law 2/2023 on the protection of whistleblowers**.

## 11. CONSEQUENCES IN THE EVENT OF NON-COMPLIANCE

Personnel who violate this [Policy](#) may be subject to disciplinary measures proportional to the degree of non-compliance, in accordance with the provisions of collective agreements and other applicable regulations.

In the case of third parties, the sanctions regime specified in the relevant commercial, civil or other regulations shall apply.

If applicable, the competent authority will be promptly notified.

## 12. SUPERVISION MECHANISMS

The body responsible for monitoring and overseeing the principles and guidelines outlined in this [Policy](#) is ENAIRE's Ethics and Regulatory Compliance Committee.

## 13. DISCLOSURE AND DISSEMINATION

In compliance with the requirements of international transparency standards and practices, this [Policy](#) will be made available to all stakeholders on ENAIRE's website for their information and consultation.

Similarly, the Policy will be appropriately communicated and disseminated internally using existing tools, to help everyone acting on behalf of ENAIRE to understand and apply it.

## 14. APPROVAL AND VALIDITY

Reviewed by the Ethics and Compliance Committee on 6 November 2025, and following its presentation to the Executive Committee on 14 January 2026, this [Policy](#) was approved by ENAIRE's Governing Board at its meeting on 28 January 2026, coming into effect 10 calendar days after its approval and remaining in force until any modification is made.

This [Policy](#) is subject to review and updating as needed to adapt it to any regulatory, social, economic or organisational changes.