

COMPLIANCE PILLAR



The 'Compliance' pillar is part of the Governance Elements pillar of our sustainability strategy, working to create a culture of corporate identity and ethics that guides the behavior and decision making of our vantázticos and vantázticas. At this initial stage, the key stakeholders involved in the pillar are the Vantázticos and Vantázticas, as well as our valued customers and suppliers. This strategic commitment is closely aligned with Sustainable Development Goals (SDGs) numbers 2, 3, 5, 11 and 13, consolidating our firm commitment to responsible and sustainable business practices.

This pillar is structured around two fundamental initiatives:

- Implementation of the first Compliance System: focuses on establishing a comprehensive framework that promotes ethics and compliance with legal regulations in all the company's operations. This system seeks to prevent and detect possible criminal conduct, strengthen the organizational culture based on integrity and ensure compliance with applicable regulations.

- Increased DSE score Corporate Action 2024 - Ethics and Governance: focuses on raising the score obtained in the Ethics and Governance dimension of the Corporate Sustainability Diagnostic (CSD) conducted by Corporate Action in the year 2024. This objective involves implementing improvements and strengthening ethical and governance practices in the company, seeking to achieve a higher sustainability index in this specific dimension.



The initiatives, goals and KPIs defined for this semester are as follows:

Initiative	Goal	KPI
Implementation of the first Compliance System.	Realization of the Project within the year 2023.	Process completed and disseminated.
DSE Corporate Action 2024, in the dimensions of Ethics and Governance.	Improve our overall score in the annual diagnostic conducted by Corporate Action, specifically in the Ethics and Governance dimension.	Increase in DSE score specific dimensions Company Action. Baseline scores (Dec 2022) Ethics and Governance - IS: 58%.

Initiative 1: Implementation of the first compliance system:

- **Crime Prevention Model:** In collaboration with our legal team, we have established a comprehensive crime prevention model that covers key aspects for the identification and mitigation of legal and ethical risks.
- **Visibility on Online Platforms:** To increase transparency and accessibility, we created a dedicated Compliance section on both our website and intranet. This provides our stakeholders with easily accessible information on our compliance-related policies and practices.
- **Definition of the Compliance System:** We have developed and defined a comprehensive compliance system that encompasses specific policies, procedures and practices to ensure regulatory and ethical compliance in all of the company's operations.
- **Launch of the Compliance Pillar:** We successfully carried out the official launch of the Compliance Pillar, thus consolidating our commitment to corporate ethics and regulatory compliance.
- **Compliance Week:** We organized the first Compliance Week, which included an awareness campaign, an informative talk with an external compliance expert and a training at Bukplay entitled "Generating a Compliance Culture". These activities helped to raise awareness and educate our team on the importance of compliance.
- **Preparations for Compliance Audit:** In preparation for our first Compliance Audit, we have made significant progress. We have defined scopes, obtained quotes from 5 suppliers, and selected the company we will work with. The audit will take place in the second half of 2024, after updating all our documentation in accordance with the new laws related to economic crimes. This process will further strengthen our commitment to regulatory compliance and ethical management of the company.

Initiative 2: Improvement of the Ethics and Governance dimension score.

The above efforts are aligned with our objective to raise the sustainability index of the 'Ethics and Governance' dimension. We are confident that these steps will contribute significantly to improving our score in the next measurement of the Corporate Sustainability Diagnostic (CSD) Corporate Action 2024, reflecting our continued commitment to the highest ethical and governance standards throughout our operations.