



## ANTI-TRUST AND FAIR BUSINESS PRACTICES POLICY

FIVEBIOENERGY, S.L.

Fivebioenergy, S.L. (“**Fivebioenergy**”) is committed to full compliance with all applicable competition (antitrust) laws in every market where it operates. Fair competition fosters innovation, efficiency, and value for our customers and partners. This antitrust policy (the “**Policy**”) ensures that all business decisions are made independently, ethically, and transparently, in line with the EU competition law.

- **Key Principles**

1. Compete on merit. Fivebioenergy competes through innovation, quality, service, and sustainability — never by restricting competition.
2. Zero tolerance for restrictive agreements. It is strictly prohibited to make or facilitate agreements or practices that could prevent, restrict, or distort competition.
3. Independence of decision-making. All commercial decisions (pricing, volumes, tenders, customers, suppliers) must be taken independently, without coordination or consultation with competitors.
4. Transparency and integrity. Communications — internal or external — must be factual, accurate, and never suggest collusion or anti-competitive intent.

- **Prohibited Conduct**

Fivebioenergy strictly prohibits any action that may infringe competition law, including but not limited to:

- Price-fixing — agreeing with competitors to fix or coordinate prices, discounts, or other trading conditions.
- Market or customer allocation — dividing territories, customers, or suppliers.
- Bid rigging — coordinating tenders or agreeing who will win or participate.
- Output restriction — limiting production or sales to influence market prices.
- Exchange with competitors of commercially sensitive information — sharing non-public data on prices, costs, strategies, or capacity.
- Abuse of dominance — exploiting a market position to exclude competitors or impose unfair terms.

- **Interactions with Competitors and Trade Associations**

Participation in industry forums and trade associations must be transparent, agenda-driven, and limited to legitimate topics (e.g., safety, sustainability, regulation). Employees must immediately leave and record any meeting where anti-competitive discussions arise.

Any information exchange must comply with the “need-to-know” principle and be aggregated, historic, and non-critical from a confidential point of view.

- **Responsibilities and Reporting**

All employees share responsibility for compliance. Concerns or suspected breaches must be reported immediately to the Compliance Risk Committee or via Fivebioenergy's whistleblowing tool.

Reports will be treated confidentially and without retaliation. Fivebioenergy encourages early self-reporting in case of potential infringements to limit risks and support leniency considerations under EU and national law.

- **Consequences of Non-Compliance**

Breaches of this Policy or competition law can lead to:

- Significant regulatory fines;
- Civil damage claims and reputational harm;
- Disciplinary measures including dismissal or contract termination; or
- Possible individual liability (fines or criminal prosecution).

- **Commitment**

Fivebioenergy's board of directors and management team reaffirm their full commitment to fair competition, ethical conduct, and transparency.