

# Competition Policy

## Amara NZero Group

April 24, 2025

### 1. Introduction

The Board of Directors of Green Bidco, S.A.U. (the "**Company**"), the parent company of Amara NZero Group, is entrusted with the responsibility of ensuring compliance with the applicable regulations to all companies within Amara NZero Group (the "Group" or "**Amara NZero**"), in all territories and markets where it operates.

Amara NZero understands competition law as a necessary framework designed to ensure a fair and equitable business environment, promoting free competition and preventing anti-competitive practices that could harm consumers and distort the market. In an increasingly interconnected and globalized world, compliance with competition regulations is crucial to maintaining the integrity and sustainability of the business environment.

For all the above mentioned, this Competition Policy (the "**Policy**") is approved.

### 2. Purpose and scope

This Competition Policy aims to establish the guidelines that must be applied at all times during the development of the activities of the Amara NZero Group in order to ensure compliance with current regulations in this area.

This Policy is applicable to all employees, professionals, managers and members of the management bodies of the Amara NZero Group companies as well as any third party acting on behalf of Amara NZero regardless of the geography in which it operates, and its principles must be communicated and applied in all relations with the Stakeholders.

Amara NZero Group companies will adapt the content of this Policy to the regulatory requirements that may be applicable in the territory in which they are established.

### 3. Principles of action

#### 3.1. Collusive Practices

There shall be no coordination with competitors aimed at:

- a) fixing prices or trading conditions
- b) controlling production, distribution or technical development
- c) sharing of markets, customers or tenders
- d) applying dissimilar conditions between competitors in equivalent situations.
- e) tying contracts to the acceptance of additional conditions unrelated to the subject matter of the contract.

### 3.2. Abuse of dominant position

- a) Where Amara NZero has a dominant position in a market, the following conduct is prohibited:
1. Imposing unfair prices or trading conditions.
  2. Limitation of production, distribution or technical development to the detriment of other companies or consumers.
  3. Unjustified refusal to meet demands for purchases or the provision of services.
  4. Unequal terms and conditions for equivalent situations between competitors.
  5. Linking contracts to additional conditions not related to the subject matter of the contract.
- b) In addition, cross-subsidies between activities or companies within the Group may constitute abuse of a dominant position, and all intra-group relationships should be reviewed by Legal Services.

### 3.3. Unfair competition

Behaviours that contravene good faith in the market will be avoided, including:

- a) Acts of deception or those that cause confusion among customers.
- b) Aggressive practices that involve the denigration of competitors.
- c) Acts that incite customers or employees of competitors to breach contracts.
- d) Acts that exploit a situation of economic dependency.
- e) Acts that exploit others' reputation for personal benefit.

### 3.4. Merger control

Corporate operations involving business concentrations, such as acquisitions or the constitution of joint ventures, must be analysed beforehand to ensure that they do not infringe competition regulations and, if necessary, prior authorisation must be obtained from the corresponding competition authority.

### 3.5. Intragroup agreements

Prior to entering into agreements between Group companies, it must first be confirmed that such agreements do not distort free competition in the market.

### 3.6. Participation in industry associations

Industry associations are an area requiring special supervision and vigilance due to the potential risk of restricted agreements, anti-competitive practices and sensitive and confidential information.

For this reason, the following guidelines should be followed:

- **Before the meeting:** check the agenda and, in case of doubt, consult with the line manager and Legal Services.
- **During the meeting:** in the event of a subject affecting current or future prices, quantities, commercial conditions or, in general, any confidential and/or strategic information, expressly state the opposition; if the conversation continues, the meeting will be left, the reasons will be asked to be recorded in the minutes and Legal Services will be informed.

- **After the meeting:** inform the line manager and, if in doubt, Legal Services of what was discussed and the outcome of the meeting. A copy of the notes taken and minutes or other documents produced at the meeting should be provided prior to dissemination (within and outside the company).

### **3.7. Collaboration with competition authorities**

In the event of an inspection by the competition authorities, the Legal Services shall be contacted immediately and their instructions followed, and an attitude of cooperation with the officials shall be adopted at all times without obstructing the inspection process.

### **3.8. Periodic review. Controls and preventive measures**

- a) Activities shall be periodically reviewed to identify activities that may pose a risk of a competition infringement and controls and preventive measures shall be defined to mitigate and control such risk.
- b) Awareness-raising and training actions shall be carried out for all employees, including senior management, as well as specific training for those groups of the Group whose functions are more exposed to the risk of infringement in competition matters.

### **3.9. Transparency and communication**

The use of the channels provided by the Internal Reporting System to report facts or conduct that infringe or may infringe competition law shall be encouraged and promoted.

## **4. Update**

This Policy is incorporated into the group of corporate compliance policies, with the Compliance Committee being responsible for its review and dissemination.

This Policy was approved by the Board of Directors of Green Bidco, S.A.U., parent company of the Amara NZero Group, on 24 April 2025.