

FINANCIAL RESOURCE MANAGEMENT MODEL

CHANGE CONTROL

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1. INTRODUCTION. OBJECT AND SCOPE OF THE FINANCIAL RESOURCES MANAGEMENT MODEL

This Financial Resources Management Model (hereinafter also referred to as the "Model") aims to ensure, in accordance with the provisions of Article 31 bis 5.3° of the Criminal Code, the effective adoption and implementation of an appropriate financial resources management model within the FUNDACIÓN DONOSTIA INTERNATIONAL PHYSICS CENTER – DIPC (hereinafter, "DIPC").

Thus, the Model demonstrates DIPC's firm commitment to ensuring the proper compliance with applicable laws and regulations, as well as best practices in accounting, financial, and tax matters, in such a way that it prevents or minimizes, to the greatest extent possible, the potential commission of crimes or violations of any other nature within DIPC, especially in relation to its financial department.

2. SUBJECTIVE SCOPE OF APPLICATION

The Model applies to all professionals at DIPC, regardless of their contractual type, hierarchical or functional position, with particular emphasis on the members of its Board of Trustees, Executives, and Heads of its various departments. All of them will be referred to individually as the "Professional" and collectively as the "Professionals" hereinafter. Thus, and without prejudice to the different activities carried out in each of the departments that make up DIPC, any Professional within the organization must always be aware of and comply with the provisions of this Model.

3. MANAGEMENT OF THE FINANCIAL RESOURCES MANAGEMENT MODEL

DIPC has adopted and implemented a system for controlling and managing its financial resources, with the objective of ensuring compliance with accounting, tax, and financial regulations, in order to achieve the development of its activities in an integral, efficient, effective, orderly, and diligent manner. This includes guaranteeing the maintenance of books, records, and accounts in an accurate manner, as well as an appropriate internal accounting system and effective control within the financial domain.

The governance of this system is entrusted to the financial manager, who, under the supervision of the DIPC Board of Trustees, is responsible for the tasks of the department and has the control measures in place to ensure the proper compliance with this Model.

4. CONTROL MEASURES

To properly carry out these tasks, the head of the financial department has the following control measures:

- Restricted access for the General Director to DIPC's bank accounts, also limiting the possibility of making collections and payments.
- Existence of powers that are limited both quantitatively and temporally for the disbursement of funds.
- Payments and collections are made only via bank transfer and credit card, with a limitation on cash to minimal amounts.
- Annual closing of the financial statements and monthly accounting closures of the profit and loss account.
- Preparation of annual accounts that provide a true and fair view of DIPC's assets, financial position, and results.
- External audit, conducted annually, of the annual accounts to ensure that they truly reflect the assets and financial position of DIPC, as well as the results of its operations.
- Submission of binding tax inquiries to the Gipuzkoa Provincial Treasury prior to conducting operations with potential fiscal risk.
- Ongoing legal advice from external legal advisors, especially in tax matters.

5. ANTICORRUPTION PRACTICES

DIPC fights and prevents corruption in all its forms. Specifically, it strictly prohibits both the acceptance and the delivery of facilitation payments intended to expedite or facilitate any type of procedure or the achievement of any advantageous position, even if the purpose is not to obtain an undue benefit.

DIPC also prohibits any form of bribery or attempted bribery in the conduct of any activity within its organization. Bribery is understood to be the offering, delivery, or acceptance of any gift, loan, commission, reward, or any other benefit offered to a person as an incentive to do something dishonest, illegal, or that could lead to a breach of trust for the benefit of DIPC or any of its Professionals, even if the objective is to establish any kind of commercial relationship. These prohibitions apply both to relations with public authorities and private entities.

Furthermore, donations to political parties and their affiliated foundations are completely prohibited.

DIPC also prohibits any activity by its Professionals that could constitute the crime of influence peddling with a public official or authority, taking advantage of any personal, family, or affinity relationships to obtain a favourable decision, directly or indirectly, for DIPC. Finally, the acceptance of gifts will be subject to the rules established in the Gift Protocol, which is part of the Corporate Compliance Program and the DIPC Anti-Fraud System.

6. GOOD PRACTICES IN TAX MATTERS

In tax matters, DIPC is committed to acting in accordance with the following guidelines:

- Collaborate with the Gipuzkoa Provincial Treasury, as well as with any other public tax authority, according to the principles of transparency, good faith, loyalty, and mutual trust.
- Fulfil and make timely payments of all tax obligations established by the applicable tax regulations.
- Act and make decisions in a reasoned and well-founded manner when applying and interpreting the applicable tax regulations.
- Reduce conflicts arising from the interpretation of the applicable tax regulations, favoring the use of the instruments established by the tax legal framework, as well as seeking the services of external advisors with proven technical expertise when dealing with matters of special complexity or when there are interpretative doubts about the tax regulations to be applied in corporate reorganization operations, extraordinary transactions, or new activities, among others.
- Disseminate and inform Professionals with direct and indirect involvement in tax matters of any updates, information, or actions necessary to ensure the proper compliance with the Model, as well as the anti-corruption compliance manual, the anti-corruption policy, and the other documents that make up the Corporate Compliance Program and DIPC's Anti-Fraud System.

Thus, in application of the aforementioned principles, DIPC adopts the following practices:

- Promote the implementation of all good tax practices that lead to the reduction of significant areas of uncertainty and the prevention of behaviors likely to create them.

Avoid the use of opaque structures, processes, or systems with primarily tax-related purposes, designed with the intent to prevent the Gipuzkoa Provincial Treasury, as well as any other public tax authority, from gaining knowledge of them.

- Inform the Board of Trustees of the tax consequences of investments or matters that require their approval when these constitute a relevant factor, as well as before the preparation of the annual accounts and the submission of the Corporate Tax or any analogous tax on DIPC's earnings.
- Inform the General Director and the Board of Trustees, when appropriate, of the knowledge of any possible money laundering activity.

Furthermore, the Professionals of DIPC whose activities are carried out in the tax domain must:

- Effectively manage and comply with DIPC's tax guidelines.
- Apply all laws, rules, and regulations with technically sound judgment.
- Exercise the highest level of professional diligence and judgment to reach well-reasoned conclusions.
- Ensure that all decisions are made at an appropriate level and supported by documentation that outlines the facts, conclusions, and risks involved.
- Seek advice or opinions from reputable external advisors when tax legislation is subject to interpretation and its significance requires it, before making and/or taking decisions.
- Develop and foster good working relationships with tax authorities, government agencies, and other related third parties in a professional and appropriate manner.
- Take all necessary actions with tax authorities in order to minimize legislation.
- Periodically review tax policies and procedures to ensure their continued validity.

7. ALLOCATION OF RESOURCES TO THE COMPLIANCE COMMITTEE

In order to ensure more effective prevention of crimes within DIPC, the organization has provided the Compliance Committee with the necessary financial and human resources to ensure the proper performance of its work in criminal prevention. Thus, DIPC allocates, in its annual budgets, a specific budget or financial provision to ensure

the proper and effective compliance with the Corporate Compliance Program and the documents that are part of it.

8. ETHICS, INTEGRITY, AND TRANSPARENCY. OBLIGATION TO REPORT AND COLLABORATE

All Professionals at DIPC are required to perform their activities in an ethical, integral, and transparent manner, especially those integrated into the financial department, as well as those whose activities are particularly related to that department. This must always be done with absolute respect for the Corporate Compliance Program, the Anti-Fraud System, and the documents that comprise them, while also adhering to the applicable laws at all times. In this regard, all Professionals are obligated to ensure compliance with the Corporate Compliance Program, the Anti-Fraud System, and the documents that comprise them, as well as with the applicable laws. They must report, when they have knowledge or reasonable suspicion of any criminal act and/or fraudulent activity, as well as any other irregularity of any kind detected within DIPC, particularly in the areas covered by the Model. This should be done through the Internal Reporting System and in accordance with the Operating Rules of the aforementioned Internal Reporting System. Furthermore, all Professionals are obligated to cooperate if required to do so in investigations that may be conducted as a result of reports received through the Whistleblower Channel.

9. ENTRY INTO FORCE AND VALIDITY OF THE MODEL

The Model was approved by the DIPC Board of Trustees on June 28, 2023, coming into force and remaining fully valid unless any modifications are made to it.