

# BACKGROUND CHECK POLICY

HORSAN BROKERS COMPANY SL

Registered Office: Calle Campoamor, 28 - Piso 1, Castellón de la Plana, Spain

Version 1.0 | Effective Date: 20 April 2026 | Approved by: Board of Directors

## 1. Purpose

HORSAN BROKERS COMPANY SL is committed to maintaining a workforce of persons with the integrity, competence and reliability required for their positions. This Policy establishes the framework for conducting background checks on prospective and current employees, directors, officers and key business partners, in order to protect the Company, its employees, counterparties and assets.

## 2. Scope

This Policy applies to:

- All candidates for employment with the Company.
- All current employees in roles identified as sensitive or high-risk.
- All directors and officers of the Company.
- All consultants, contractors and agents acting on behalf of the Company where the level of access, responsibility or exposure justifies it.

## 3. Legal Framework

Background checks are conducted in accordance with:

- Regulation (EU) 2016/679 (GDPR) and Spanish Organic Law 3/2018 on Data Protection and Guarantee of Digital Rights.
- Spanish Workers' Statute (Estatuto de los Trabajadores).
- Any other applicable employment and data-protection legislation in the relevant jurisdictions.

Checks are performed only where there is a legitimate purpose, with appropriate legal basis and with the informed consent of the person concerned where required.

## 4. Principles

- **Legality:** all checks are conducted in compliance with applicable law.
- **Proportionality:** the extent of the check is proportionate to the responsibilities of the position.
- **Relevance:** only information relevant to the role is collected.

- **Transparency:** the person concerned is informed of the nature of the check and the data processed.
- **Confidentiality:** all information is handled with strict confidentiality and limited access.
- **Non-discrimination:** results are assessed objectively and without discrimination on any protected ground.

## 5. Risk Tiers and Scope of Checks

### 5.1 Standard Positions

For administrative, operational and other standard positions, the following are verified:

- Identity and nationality (passport or national ID).
- Right to work in the relevant jurisdiction.
- Curriculum vitae and declared employment history (at least the last 5 years).
- Academic and professional qualifications.
- Two independent professional references.

### 5.2 Sensitive Positions

For positions involving access to finance, trading, compliance, senior management, confidential information or representation of the Company, the following additional checks are conducted:

- Verification of absence from applicable sanctions lists (EU, UN, OFAC, UK HMT).
- PEP screening.
- Adverse media screening.
- Verification of criminal record certificate (where legally permitted).
- Verification of any regulatory disciplinary record.
- Verification of professional licences and memberships.
- Where applicable and legally permitted, credit history check.

### 5.3 Directors, Officers and UBOs

Enhanced checks are applied, including confirmation of identity, criminal record, regulatory disciplinary history, sanctions and PEP screening, adverse media, and verification of sources of funds and wealth where relevant.

## 6. Consent and Privacy

Before initiating a check, the person concerned receives a privacy notice describing the nature and scope of the check, the legal basis for processing, the recipients of the data, the retention period and their rights under data-protection law.

Where required by law, express written consent is obtained. The person may withdraw consent at any time, with the consequences this may have for the continuation of the recruitment or contractual process.

## 7. Data Retention

Background-check data is retained only for as long as necessary for the purpose for which it was collected:

- For unsuccessful candidates, data is deleted within a reasonable period after the recruitment decision, unless retention is required to defend potential legal claims.
- For employees, data is retained for the duration of the employment relationship and for the period required by applicable labour and tax legislation after termination.
- Sensitive data (such as criminal record information) is retained only for the minimum period strictly necessary.

## 8. Outsourced Providers

Where the Company relies on external providers to conduct background checks, these providers:

- Must be selected on the basis of demonstrated compliance with data-protection legislation.
- Must sign a data-processing agreement meeting the requirements of Article 28 GDPR.
- Are subject to oversight and periodic review by the Company.

## 9. Assessment of Results

Adverse findings are assessed on a case-by-case basis, taking into account:

- The nature and seriousness of the finding.
- The time elapsed since the relevant event.
- The relevance of the finding to the duties of the position.
- Any mitigating circumstances.

The person concerned is given the opportunity to comment on adverse findings before a final decision is taken.

## 10. Responsibilities

- **Human Resources:** coordinates checks for employees and candidates.
- **Compliance Officer:** coordinates checks for directors, officers, UBOs and sensitive third parties, and reviews adverse findings.
- **Managers:** identify positions subject to enhanced checks within their teams.
- **Data Protection Officer (or designated data-protection contact):** ensures ongoing compliance of the programme with data-protection law.

## 11. Training

HR staff, hiring managers and the Compliance Officer receive training on this Policy, applicable legal requirements and the correct handling of sensitive personal data.

## 12. Review

This Policy is reviewed at least every two years and whenever there is a material change in applicable legislation.

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### Approval and Sign-Off

This Policy has been reviewed, approved and adopted by the Board of Directors of HORSAN BROKERS COMPANY SL and is effective as of 20 April 2026.

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**Javier Sánchez**

Chief Executive Officer / Administrador Único

HORSAN BROKERS COMPANY SL

Date: 20 April 2026

