

CRIMINAL COMPLIANCE AND ANTI-BRIBERY POLICY

INTECSA INDUSTRIAL has the firm commitment to comply with the highest ethical standards in carrying out its business activities. For this purpose, it has established a Compliance and Anti-Bribery Management System to minimise the Company's exposure and to control criminal risks under the principle of respect for the law whilst including the training of the employees in professional ethics, all of this within the context of the Organisation's aims.

The Compliance and Anti-Bribery Management System, based on the identification, evaluation, elimination and/or reduction of criminal risks and bribery, has been designed and implemented with the aim of involving **INTECSA INDUSTRIAL's** employees, its suppliers and, in general, all stakeholders, in the identification and control of such risks.

The Company has identified that the activities of construction, execution of turnkey projects, procurement and outsourcing, business development and commercial management, financial administration, human resources management and health and safety at work, are areas in which the criminal offences the Company's attempts to prevent might be perpetrated.

Therefore, **INTECSA INDUSTRIAL**, in the regular carrying out of its activities, considers compliance with the following **principles** on which this Policy is based a priority:

- To demand that all members of the Organisation, as well as all stakeholders that relate to it in the course of its activity, to comply with the criminal legislation applicable to our Organisation. In particular, INTECSA prohibits its employees and stakeholders from participating in activities that may result in bribes involving all types of public and private employees.
- To minimise the exposure of the Organisation to criminal risks and bribery by implementing a system of controls that is adequate and consistent with the purposes and processes of the Organisation, which identifies the activities in which the criminal offences, subject to a prevention obligation, might be perpetrated.
- To guarantee, at all times, compliance with the criminal legislation in force and to prohibit bribery, facilitation payments and the commission of criminal offences, as well as to confirm the Organisation's adherence to the principles established in the UN General Assembly Resolution 58/4, of 31st October 2003, and those other Agreements that the Company may subscribe to.
- To provide the appropriate framework for defining, reviewing and achieving effectively the goal of zero tolerance of criminal risks and bribery, whilst establishing measures of prevention, detection and early management at all levels and disciplines of the Company to prevent the commission of crimes.
- To guarantee the Organisation's commitment to comply with the requirements of Criminal Law and its implementing regulations, as well as those derived from the Organisation's Compliance and Anti-Bribery Policy and the Compliance System that supports it.

- To impose, on the entire Organisation, the obligation to report suspicious facts or behaviours relating to criminal risks for the Organization, through any of the channels established for this purpose in the Compliance and Anti-Bribery System.
- To guarantee the confidentiality of the information received to the entire Organisation, stakeholders and third parties in general, and the non-application of any kind of retaliation to those who collaborate in the attainment of the goals established in the Compliance and Anti-Bribery System.
- To review its performance regularly, with the aim of providing the appropriate framework to guarantee a process of continuous improvement.
- To ratify the authority and independence of the Compliance body in the exercise of its functions with respect to the Organisation's governing body.
- To train and inform all personnel adequately regarding Compliance and Anti-Bribery, as well as to improve the awareness of all personnel and encourage communication of those aspects that may improve the attainment of this Policy's goals.
- To analyse and document the causes of incidents in an exhaustive manner, in order to implement the necessary corrective and preventive actions, capable of eliminating or reducing the risks at their origin and/or the consequences thereof.
- To maintain fluid and permanent communication, in terms of Compliance and Anti-Bribery, at all levels of the Organisation and externally, in order to encourage compliance with individual obligations in this matter, to promote the participation of all personnel, and to integrate our collaborators, subcontractors, suppliers and, in general, all stakeholders in the attainment of this Policy's goals.
- To reinforce the principle of zero tolerance with behaviour that does not comply with the requirements of this Compliance Policy and those derived from Compliance and Anti-Bribery Management System, by using the disciplinary regime or those legal remedies available to the Organisation.

The General Management holds the firm belief that all the members of the Company's staff understand the importance of these guidelines and shall integrate them into their working style.

Madrid, 1st September 2019

Raúl Llamazares de la Puente

President & CEO