

CRIMINAL COMPLIANCE, ANTI-BRIBERY, AND ANTI-TRUSTPOLICY

APROB.	VERIF.	PREP.	EDICION	FECHA	DESCRIPCION
Consejo Administración	AAW	AAW	Rev1	30/06/2021	
Representante del Administrador Único	AAW	AAW	Rev2	09/06/2023	Adaptación Ley 2/2023 Sistema Interno de Información



CRIMINAL COMPLIANCE, ANTI-BRIBERY, AND ANTI-TRUST POLICY

INTECSA INDUSTRIAL, a company belonging to the VINCI Group, is firmly committed to upholding the highest ethical standards in the conduct of its business activities. To this end, it has established a Criminal Compliance, Anti-Bribery, and Anti-Trust PROGRAM designed to minimize exposure to, and control, the company's criminal risks under the principles of respect for the law and the training of employees in professional ethics, all within the context of the organization's objectives.

The Program, based on the identification, assessment, elimination and/or reduction of criminal and bribery risks and activities contrary to Competition Law, has been designed and implemented with the aim of involving **INTECSA INDUSTRIAL**'s employees, suppliers, and, in general, all interested parties in identifying and controlling such risks. In addition, the Company has adapted its internal procedures to the applicable legislation and, in particular, has established an Internal Reporting System in accordance with the guidelines of **Law 2/2023**, with the aim of safeguarding the rights of all parties involved in the procedure.

The Company has identified construction activities, turnkey project execution, procurement and subcontracting, business development and commercial management, financial administration, human resources management, and occupational health and safety as areas in which the crimes and activities this policy seeks to prevent may occur.

For this reason, in the regular course of its activities, **INTECSA INDUSTRIAL** considers the following principles—on which this policy is based—to be of the utmost importance:

- Require all members of the Organization, as well as any interested parties involved in the course of our business activities, to comply with the criminal and administrative legislation applicable to our Organization. **INTECSA** prohibits its employees and stakeholders from engaging in activities that may give rise to bribery or anti-competitive practices involving any type of public or private employee.
- Respect and promote free, fair, and honest competition, demonstrating its absolute and highest-level commitment, as laid out in the VINCI Code of Ethics, to compliance with Anti-Trust regulations in all jurisdictions in which it operates.
- Minimize the Organization's exposure to criminal and bribery risks and activities contrary to Competition Law by implementing an appropriate system of controls aligned with its objectives and processes, identifying those activities in which crimes subject to prevention obligations may be committed.
- Ensure at all times compliance with applicable criminal and administrative legislation and prohibit bribery, facilitation payments, criminal conduct, and activities contrary to Competition

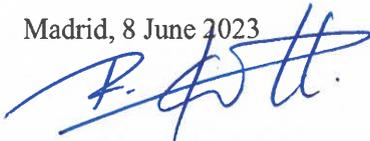
Law, confirming the Organization's adherence to the principles established in United Nations Resolution 58/4 of 31 October 2003 and any other agreements signed by the company.

- Provide the framework needed to define, review, and effectively achieve the objective of zero tolerance with respect to criminal and bribery risks and conduct contrary to Competition Law, and to establish prevention, detection, and early management measures at all levels and in all departments of the company to prevent the commission of crimes.
- Ensure the Organization's commitment to complying with the requirements of criminal legislation and its implementing regulations, as well as those derived from the Organization's Criminal Compliance, Anti-Bribery, and Anti-Trust Policies and the Compliance Program that supports it.
- Impose on the entire Organization the obligation to report, through any written or verbal means, including anonymously, any suspicious facts or conduct related to criminal risks, through any of the reporting channels established in the Criminal Compliance, Anti-Bribery, and Anti-Trust Policies.
- Guarantee all members of the Organization, stakeholders, and third parties the confidentiality of the information received and ensure that no retaliation is taken against those who contribute to achieving the objectives of the Management System. INTECSA will investigate all reports, even those made by third parties who may not have a direct or legitimate interest in the reported facts.
- Periodically review performance to ensure an adequate framework for continuous improvement.
- Confirm the authority and independence of the Compliance Body in the exercise of its duties with respect to the Organization's governing body.
- Adequately train and inform all personnel on matters relating to Criminal Compliance, Anti-Bribery, and Competition Defense, raising awareness and encouraging communication of any aspects that may improve the achievement of this policy's objectives.
- Analyze and document the causes of incidents comprehensively, in order to implement the necessary corrective and preventive measures capable of eliminating or reducing risks at their source and/or their consequences.
- Maintain smooth and constant communication on Criminal Compliance, Anti-Bribery, and Anti-Trust matters across all levels of the Organization and externally, with the aim of promoting compliance with individual obligations, encouraging participation, and integrating collaborators, subcontractors, suppliers, and all interested parties in achieving the objectives of this policy.
- Reinforce the principle of zero tolerance for behaviors that violate the requirements of this Compliance Policy or those derived from the Management System, applying disciplinary measures or any other legal resources available to the Organization.

- Establish an internal reporting channel that allows employees and interested parties to report, confidentially and securely, any violation of the law or the Company's internal regulations. The preferred communication method is the COBRA SERVICIOS INDUSTRIALES digital platform: <https://cobrais.integrityline.com>, without prejudice to other channels that may be appropriate depending on the circumstances.

The Senior Management is fully convinced that the company's entire Organization understands the importance of these guidelines and integrates them into its working practices.

Madrid, 8 June 2023

A handwritten signature in blue ink, appearing to be 'P. J. S. H.', written over a horizontal line.

The Sole Administrator