



Compliance Policy

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1. COMPLIANCE POLICY

The mission of TECOZAM ESTRUCTURAS Y DRENAJES, S.L. (hereinafter, "TECOZAM" or the "Organization") is the execution of all kinds of works, land, railway, port and airport infrastructures, as well as large-scale hydraulic works based on experience, quality, demand and responsibility. This mission represents a commitment to clients, teams, shareholders, suppliers and all TECOZAM collaborators.

Through this policy, the objectives of our Organization in terms of criminal regulatory compliance are defined and expressed, with the aim of achieving the maximum degree of efficiency in compliance with criminal law, so that with this we reaffirm the values established in our Code of Ethics and that we must bear in mind in the exercise of our activities and in the relations with our stakeholders. For all these reasons, TECOZAM undertakes the following:

- The effective implementation and development of ethical behavior and compliance with current legislation by all members of the Organization regardless of their place in the organizational chart and the geographical location where they provide their services.
- "Zero tolerance" for any illicit or criminal act related to our business activities or contrary to the values and principles contained in our Code of Ethics, both by the members of the Organization and by our business partners or, in general, by any of the interest groups. With this, the development of our activities will be presided over by ethical values, compliance with the law, objectivity, transparency, maximum professionalism and commitment, especially our commitment to create products to improve the health of our consumers.

In particular, conduct that could constitute any form of corruption or bribery is not tolerated, both when an official or public authority, such as a company, may be involved, whether in national or international transactions, and must at all times act with respect for fair competition between companies and the public function. Nor do we admit conduct that involves the commission or the risk of commission of any of the crimes that are contemplated in our map of criminal risks.

- Appoint a Criminal Compliance Body, which may take the form of a committee or a single-person body, to supervise the operation and compliance with our Crime Prevention Model and the Criminal Compliance Management System ("SGCP") that develops it . The Criminal Compliance Body is appointed by the administration, enjoying authority, independence and autonomy in the exercise of its functions: This body will be endowed with sufficient material and economic resources to be able to carry out its functions,

promote and respect its autonomy and independence and facilitate its training in order to provide it with the authority and leadership necessary for the exercise of their functions.

- Train, educate and sensitize the members of the Organization and, eventually, the business partners as a spring to promote a true culture of ethics and compliance in our Organization and spread it among our stakeholders. Said formations will deal with the key elements of the criminal responsibility of the legal person, the crimes associated with the activities and the criminal risk map of the organization, the consequences of non-compliance, as well as the roles and responsibilities of the members of the organization in relation to the SGCP.

- Enabling and maintaining a Channel for complaints and queries, as well as internal regulations that develop it, regulating the rights and obligations of users, guaranteeing rights such as confidentiality and protection of personal data, objectivity and independence of criteria in the decision-making and, in particular, the presumption of innocence and the guarantee of non-retaliation for people who report facts in good faith. Said Channel must be used by any employee when a non-compliance or risk of non-compliance with the Code of Ethics, the SGCP, the internal regulations and controls or before the commission (or the risk of commission) of an illegal act or crime is detected.

- Establishment of a SGCP, developing the Crime Prevention Model adopted, with the aim of seeking the maximum effectiveness of the model. In addition, indicators will be established to be able to carry out the monitoring of the SGCP, ensuring its effective implementation, development and continuous improvement.

- Adoption of the appropriate disciplinary measures in the event of infractions of the Code of Ethics, the SGCP, of internal regulations and controls or in the event of the commission of an illegal act or crime, which will be considered a very serious infraction of contractual good faith in art. 54.2 of the workers' Statute and other applicable and concordant legislation. This is without prejudice to the responsibilities of any other nature to which the acts committed could give rise.

This policy will be reviewed periodically, being mandatory for the members of the Organization, as well as for those people who act in the name or on behalf of the organization, business partners, and other interest groups, within the normal exercise of their duties. activities and transactions for our organization.

2. Annex 1

2.1. Definitions

Without prejudice to the legal definition that the laws applicable to the organization establish for each of the following concepts, as well as the definitions that for identical concepts are included in other internal regulations of the organization, the following are defined 1: following concepts, which are applicable to the set of documents and materials that are part of the Crime Prevention Model.

- Corrective action: Action to eliminate the cause of a nonconformity and prevent its recurrence.
- Top management: Person or group of people who direct and control an organization at the highest level.
- Audit: Systematic, independent and documented process to obtain evidence and evaluate it objectively in order to determine the degree to which the previously established verification criteria are met.

Note 1. An internal audit is performed by the organization itself or by an external party on its behalf.

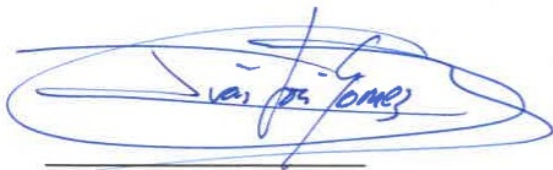
Note 2. Independence can be demonstrated by the absence of responsibility in relation to the activity being audited, or the absence of bias and conflict of interest.

- Competence: Ability to apply knowledge and skills in order to achieve the intended results.
- Criminal *Compliance*: Compliance with the mandatory and voluntary requirements assumed in criminal matters by the organization.
- Conflict of interest: Situation in which external business, financial, family, political or personal interests could interfere with the judgment of the members of the organization when they carry out their tasks in the organization.
- Compliance: Fulfillment of a requirement.

1 Some of the definitions are extracted and adopted from the UNE 19601 standard, a high-level standard prepared by the CTN 307 technical standardization committee of the Spanish Association for Standardization UNE "Criminal compliance management systems. Requirements for their use", published in Spain on May 18, 2017 as a standard for the management of Corporate Crime Prevention Systems.

Likewise, an Annex with the glossary of different definitions that are used and that are applicable to the different materials and documents that are part of the Crime Prevention Model is attached to this policy.

Board of directors



D. Ivan Jose Gomez Rojo