

# CRIME PREVENTION POLICY

## 1. What is the Crime Prevention Management System implemented in the Company?

The Criminal Compliance Management System (CCMS) of TÉCNICAS REUNIDAS, S.A. and the affiliated organisations that expressly adhere to it (the Company), is a set of measures aimed at **preventing the commission of irregularities**, especially those of a criminal nature, that may be committed in the Company as a result of the day-to-day performance of its professional activity. It also includes measures aimed at **detecting possible irregularities and mitigating the consequences** that could result from their occurrence.

The CCMS consists of a number of elements, among which is the **Crime Prevention Policy** (the Policy), a document through which the Company establishes the fundamental pillars of its CCMS and ratifies its will to behave in a manner that complies with the applicable legislation, its internal regulations and its ethical values, defining its framework of principles of action in criminal compliance matters.

## 2. To whom is the Crime Prevention Policy addressed?

All members of the Company have the obligation to accept and agree to comply with the provisions of the Policy, regardless of their position and the territory in which they are located, unless the applicable law in the jurisdiction in which they operate establishes more stringent provisions, which shall prevail over this Policy.

In turn, the Policy is extended to all of the Company's **business partners**<sup>1</sup> for the purpose of complying with its internal due diligence processes in their selection of third parties, the purpose of which is to ensure that they meet certain criteria in terms of ethics and integrity, and commitment to regulatory compliance.

## 3. What is the purpose of the Crime Prevention Policy?

The main **objectives pursued by the Company through the implementation of the Crime Prevention Policy** are:

- Promoting a culture of ethics, honesty and respect for regulatory compliance among its members and third parties with whom it interacts and encouraging the defence of corporate values.
- Conveying to the members of the Company and to third parties with whom it interacts a message of categorical opposition to the commission of any illegal act, criminal act

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<sup>1</sup> any party, other than Members of the Company, with whom the Company has, or intends to establish, any kind of business relationship.

or otherwise, and showing zero tolerance for breaches of the law of any kind, including criminal.

- Defining the principles of action in the area of criminal compliance that the Company has decided to implement and consolidate as the fundamental pillars on which the CCMS is built.
- Establishing mechanisms to prevent individual or organisational conduct that could give rise to criminal liability for the Company, to detect such conduct and, should it occur, to sanction and respond appropriately to it, even if it is not possible to attribute it to a specific person.

The Governing Bodies and Senior Management of the Company have shown their conformity and commitment to the provisions set out in the Policy and openly express their desire to continue fostering a culture of ethics and respect for legality, including the implementation of policies and procedures aimed at preventing and mitigating the commission of crimes within the Company.

#### **4. What are the criminal compliance principles on which the CCMS is based?**

The Crime Prevention Policy establishes the following principles of action, which are considered the basis of the CCMS in place in the Company:

1. Essentially, the CCMS is based on the principles of prevention, control, reporting and redress, encouraging proactive activities, aimed at prevention and detection, as opposed to reactive activities, such as investigation and sanctioning.
2. Acting, at all times, under the protection of the legislation in force and within the framework established by the Code of Conduct published by the Company, complying with the internal regulations applicable at any given time.
3. Fostering and encouraging a preventive culture based on the principle of "zero tolerance" towards the commission of illegal acts and situations of fraud and on the application of the principles of ethics and responsible behaviour by all members of the Company, regardless of their hierarchical level.
4. Integrating and coordinating the set of actions necessary to prevent and fight both the possible commission of unlawful acts by any member of the Company or any professional from another company but related to the Company, and, in general, possible irregular or fraudulent situations.
5. Identifying the activities in which scope offences may be committed in the name, on behalf and for the benefit of the Company by its legal representatives, professionals, employees and third parties acting in the name or on behalf of the Company, in order to prevent the commission of any identified criminal risk.

6. Establishing internal rules, procedures and protocols for action and decision-making that prevent any person or group of persons from holding decision-making powers that are not subject to control.
7. Promoting the development and implementation of appropriate standards and procedures for the control and comprehensive management of crime prevention.
8. Communicating to all members of the Company (i) the types of criminal offences and conduct contrary to internal rules that can be reported and (ii) the duty to report any fact constituting a possible criminal offence, fraud or irregularity of which they are aware through the channels provided.

#### 5. In addition to these principles of action, what other elements make up the CCMS?

The CCMS is made up of a series of elements or mechanisms established in the Company to prevent, identify and resolve situations that give rise to practices or behaviours that contravene applicable legislation, internal regulations or the values of the Company.

These elements, which are mandatory for the entire Company, are aligned with the aforementioned principles and are as follows:

1. **Code of Conduct:** a document published by the Company that defines the principles, guidelines and values that should govern the development of the Company's activities and business relationships both internally, with regard to all its employees, managers and directors, and externally, in the market, with other competitors and other stakeholders.
2. **Code of Ethics for the Supply Chain:** a document defining the principles, guidelines and values that are expected to be observed by all those who form part of the Company's supply chain.
3. **Policies and procedures:** the CCMS consists of a series of policies and procedures aimed at establishing behavioural guidelines and mitigating the occurrence of irregularities or criminal offences in the development of the Company's daily activities. These documents include, among others, the following:
  - Crime Prevention Policy
  - Anti-Corruption Policy
  - Gifts and Hospitality Policy
  - Policy on Relationships with Public Officials
  - Third Party Integrity Assessment Policy and Procedure
  - Conflicts of Interest Policy
  - Antitrust Policy

- 4. Compliance Officer:** this is the body with autonomous powers of initiative and control in accordance with the provisions of article 31 bis of the Criminal Code, appointed by the Board of Directors. Essentially, he/she is responsible for supervising the functioning of the CCMS, as well as the policies and procedures that comprise it, and for the monitoring, updating and continuous improvement of the CCMS.

The Governing Bodies and the Senior Management of the Company support the Compliance Officer in the exercise of his/her duties and actively promote the compliance culture in the Company, ensuring that he/she has the appropriate resources to effectively implement the CCMS and encouraging the use of procedures and channels for reporting potentially criminal conduct that may affect the Company and its activities, among other issues.

- 5. Complaints Channel:** the Company has implemented a Complaints Channel through which Members of the Company must report any conduct or facts of which they become aware that are related to (i) an action or omission that may involve a contravention of the guidelines of the Code of Conduct or the Code of Ethics for the Supply Chain or (ii) an action or omission that may generate a risk of criminal liability.

The management and treatment of complaints is regulated by the provisions of the Guide to the Use of the Complaints Channel and Investigation Procedure.

- 6. Training and Communication Plan:** the Company has a periodic training and communication plan through which an ethical and compliance culture is promoted and the criminal risks to which each of the Company's departments or areas are exposed are made known in order to detect and prevent their materialisation.

Attendance to the training courses on criminal risk prevention is mandatory and the Compliance Area will monitor the training actions given.

- 7. Criminal Risk Map:** the criminal risks that could occur in the Company as a result of its activity are duly identified, analysed and evaluated.

#### **6. Is there an obligation to report detected irregular conduct or possible non-compliance detected?**

All members of the Company **have the obligation to report individual or collective facts, behaviours or activities** that occur in the context of the Company's operations and that may involve a breach or irregularity of the provisions of the Crime Prevention Policy, the Code of Conduct and the other policies and procedures that make up the CCMS, regardless of whether such behaviours have been ordered or requested by a superior.

TR will not tolerate any reprisal against anyone who, in good faith, reports the aforementioned breaches, nor against those who, where appropriate, participate or collaborate in good faith in the clarification of the facts reported.

To this end, and without prejudice to other existing channels within the Company for reporting practices contrary to the Company's values or internal regulations, the following URL has been set up: <https://canaletico.tecnicasreunidas.es/tecnicasreunidas>

In general, communications will be received, managed and, where appropriate, investigated by TR's Regulatory Compliance Department, in accordance with the provisions of the Guide to the Use of the Complaints Channel and Investigation Procedure.

All persons involved in the management and investigation of the reported facts are under an obligation of confidentiality.

For queries, doubts, clarifications, etc. regarding interpretation and advice on the policies that make up the CCMS, a channel of communication has been set up with the Regulatory Compliance Department via the following email address: [compliance@tecnicasreunidas.es](mailto:compliance@tecnicasreunidas.es)

## 7. What are the consequences of non-compliance with the policies and procedures that make up the CCMS?

Failure to comply with the Crime Prevention Policy, as well as with the other policies and procedures that make up the CCMS, may give rise to the corresponding disciplinary sanctions in accordance with the applicable Collective Agreement, labour legislation and other civil and commercial obligations that the member of the Company may have contracted.

In the event of non-compliance by business partners, the Company shall impose the sanctions deemed appropriate in accordance with the provisions of the contract, as well as the civil or commercial legislation applicable at the time of the events.

0	Original version	January 2018	June 2018	November 2018
1	Update	March 2022	March 2022	April 2022
<b>Rev.</b>	<b>Description</b>	<b>Compliance Area</b>	<b>Audit and Control Commission</b>	<b>Board of Directors</b>