

COMPLIANCE AND ANTI-CORRUPTION POLICY

Empresarios Agrupados is committed to strict compliance with national and international legislation as well as international agreements relating to crime prevention, human rights, environmental protection and workers' rights. This commitment is articulated in the following declaration of intent:

- Avert, monitor and prevent corruption-related offences from being committed within or on behalf of Empresarios Agrupados.
- Avert, monitor and prevent any director, manager, employee or collaborator of Empresarios Agrupados from requesting or accepting an unjustified benefit or advantage of any kind, for themselves or for Empresarios Agrupados, as consideration for undue favourable treatment in commercial relations, the contracting of services and/or the acquisition or sale of goods.
- Implement a Code of Ethics setting out the basic principles of conduct of Empresarios Agrupados's directors, managers, employees and collaborators. This Code of Ethics shall describe the general rules of professional conduct and the manner in which relations with customers, suppliers, partners and competitors are to be conducted.
- Implement a crime prevention model, following international best practices. This model shall list the crimes susceptible of being committed by managers, directors, employees or collaborators of Empresarios Agrupados, as well as the appropriate controls to identify and prevent them.
- Include, as part of its crime prevention model, an internal reporting system, with an internal reporting channel (whistleblowing channel) and an information management procedure, designed to enable any person directly or indirectly linked to Empresarios Agrupados to report any wrongdoing of which they are aware and which directly or indirectly involves Empresarios Agrupados.
- Guarantee protection and confidentiality for the person reporting any wrongdoing within the framework of Empresarios Agrupados's crime prevention model.