

AENOR GESTIÓN DE LA CALIDAD ISO 9001 ER-0040/1997 ER-0240/2014	AENOR GESTIÓN AMBIENTAL ISO 14001 GA-1999/0096 GA-2014/0110	AENOR GESTIÓN ENERGÉTICA ISO 50001 GE-2020/0023	AENOR GESTIÓN I+D+i UNE 166002 IDI-0039/2011	AENOR ANTISOBORNO ISO 37001 ASO-2018/0002 ASO-2018/0003 ASO-2018/0004	AENOR PENAL COMPLIANCE UNE 19501 GCP-2018/0014 GCP-2018/0015 GCP-2018/0016
--	---	--	--	---	---



INTEGRATED COMPLIANCE MANAGEMENT POLICY (COMPLIANCE AND ANTI-BRIBERY)

This document is the property of COPISA GROUP and its publication is controlled. Its content may not be reproduced, in whole or in part, in writing or orally, without prior written authorisation from the Company.

This Procedure is not part of any contract, nor does it imply any representation or warranty of COPISA GROUP, which reserves the right to occasionally review it in order to satisfy the requirements of a contract.

Version	Application Date	Modification
1.0	09-08-2017	Creation of the document
2.0	01-02-2018	Update of the scope of activities Copisa Group
2.1	08-02-2021	Format update
2.2	26-04-2023	Inclusion SDG

The COPISA GROUP Management, whose scope of activities where there may be risk of committing crimes in the management, contracting, design and execution of all kinds of constructions in Civil Works, Building, Restoration, industrial assembly projects, installations, maintenance and services, with the commitment to comply with legislation, current regulations and our ethical principles, has the necessary means to develop, implement and maintain a Compliance Management System for the prevention, detection and reaction to any type of criminal risk associated with business and corporate processes.



The principles governing this Policy are as follows:

- Follow the criteria of the Basic Code of Conduct and the Code of Ethics, which includes the Group's commitment to the principles of business ethics and transparency in all areas of activity and to regulate the ethical and responsible behaviour of all the Group's professionals in carrying out their activities, and the consequences arising from non-compliance.
- All the executives and employees of the Copisa Group must comply with the criminal legislation in force in the countries where they carry out their activities, observing ethical behaviour in all their actions.
- To promote an ethical and honest business culture, rejecting any type of illegal practice and avoiding all forms of corruption in all the Group's business and professional activities.
- Enhance the independence, authority and autonomy of the Compliance Committee for risk management as a basic element to prevent non-compliance, the creation of specific compliance protocols that affect the different functional areas, guaranteeing transparency, information and communication of our activities and degree of compliance through the publication of an annual report that will be communicated to interested parties.
- Make available the information and resources necessary to achieve the objectives and targets set, using the appropriate channels to create a smooth and cross-cutting communication synergy, which favours the Group's relations with stakeholders.
- MAINTAIN "zero tolerance" for possible criminal acts that may be committed within its ranks. Any relevant evidence of an offence shall be investigated and, if confirmed, effectively sanctioned. COPISA GROUP rejects any attempt to obtain a profit or business objective through illicit means.
- REFUSE business opportunities that imply some form of bribery, not tolerating corruption in the Organization.
- To provide a document reference framework with procedures, objectives, targets and associated indicators for a PROGRESSIVE MONITORING of process development, in order to be able to measure, evaluate and analyze the management carried out, as well as, to establish the criteria for CONTINUOUS IMPROVEMENT.

- FORM AND INFORM to the members of the organization and collaborators of all those aspects related to the possible risks and their magnitude that it faces as a consequence of its role in the organization, which is more important, how to face them, communicate them, denounce them, promoting a preventive activity in the execution of processes and teamwork that allows the professional and personal development of all its members and the achievement of the intended results.

This Policy is approved and will be periodically reviewed by the Management board for its continued suitability, is binding on all the personnel of COPISA GROUP, as well as those persons who carry out activities on behalf of the Organization. In relation to the collaborating companies of COPISA GROUP, a copy of this policy will be made available to you, promoting lines of action consistent with it. It should be known and applied by all in their field of professional activity.

Fdo: Orlando, De Porrata-Doria Botey


CEO
26.04.2023