



# **ANTI-BRIBERY AND ANTI- CORRUPTION POLICY**





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# 1. Purpose

The Anti-Bribery and Anti-Corruption Policy serves the primary purpose of informing all executives and employees of ARQUIMEA GROUP (**ARQUIMEA**), and any third parties with relationships with the company, of two important commitments:

- a) ARQUIMEA's commitment to permanently monitor and, if necessary, penalize any type of fraudulent action or behaviour or any that entails attitudes such as corruption, bribery or conduct that violate regulations or the market in any way.
- b) ARQUIMEA's commitment to create and maintain effective mechanisms to communicate and raise the awareness of all its executives and employees, as well as to develop a business culture based on ethics and regulatory compliance.

Based on these two commitments, this Policy pursues three important objectives:

1. Inform ARQUIMEA's executives and employees of the content of the Policy.
2. Prevent any possible action or behaviour that violates the principles and standards for operation set out in this Policy.
3. Penalize any violations that may arise with respect to those operating principles and standards.

# 2. Compliance guarantee by Arquimea

This policy will be applicable to all executives and employees of ARQUIMEA in both their internal relationships and their relationships with customers, suppliers, business partners and public administrations.

The Board and the directors of the areas of responsibility at ARQUIMEA ("**Management**") guarantee that its policies, standards and values regarding regulatory compliance and the prevention of bribery and corruption in business will be communicated to and assumed by all of its employees and business partners and that they will report them to the third parties that have relationships with ARQUIMEA (customers, suppliers and public administrations).

Management also declares that ARQUIMEA has a corporate responsibility system with sufficient resources for its continuous application and maintenance within the anti-corruption program covering ethics and compliance, as well as for its supervision and continuous improvement, updating it to align with the characteristics of the business and technological, social and legislative advances.

### 3. Principles that govern Arquimea's actions

Within the framework of the commitment to business ethics and regulatory compliance and, in particular, the policy to prevent bribery and corruption in business, ARQUIMEA assumes the following principles and commitments:

- 1) Offering cash or in-kind payments or other benefit to any person — executives or employees – of public or private entities with the intention of obtaining business or illegal advantages for him/herself or for the company is prohibited.
- 2) Giving or receiving bribes is explicitly prohibited.
- 3) Providing false information regarding the activities or the characteristics of the company is prohibited.
- 4) The commitment to comply with all national laws and regulations and to maintain and record a truthful financial and accounting record, collaborating in this respect with the tax authorities.
- 5) The explicit commitment to restrict and control so-called facilitation payments, as well as offering and receiving gifts, is guaranteed.
- 6) The establishment of policies that regulate and limit entertainment expenses, per diems and similar payments, as well as the transparency of any type of donation is guaranteed.
- 7) The extension of this Policy to stakeholders and those third parties with relationships with ARQUIMEA is ensured (suppliers, customers, business partners, external advisors, etc.), as is the obligation to communicate any suspicion or irregularity through appropriate channels, adapting the measures considered to be necessary and imposing disciplinary penalties in the case of non-compliance.
- 8) We declare express collaboration and support for the public and private efforts and initiatives intended to combat fraud, corruption in business and bribery.
- 9) All necessary assistance and cooperation will be provided to investigate alleged criminal, fraudulent or irregular activities that may have been committed by professionals or in which they may have directly or indirectly participated.
- 10) Compliance with obligations relating to the State Tax Agency, Social Security and, in general, any public administration, in accordance with current legislation.

## 4. Operating standards for professionals at Arquimea

In order to prevent situations of fraud or corruption, ARQUIMEA states that actions by its executives and employees will always be governed by the following standards:

- 1) They may not influence a public official or authority by taking advantage of a personal relationship in order to obtain a treatment, facilitation or decision that may provide a benefit to ARQUIMEA or represent any type of favourable treatment.
- 2) They will abstain from offering gifts, commissions, compensation or similar items to authorities, public organizations and administrations, political parties and institutions in general, and they will not consent to receiving any.
- 3) They will comply with the principles of honesty, impartiality, respect, confidence and integrity and will be obligated to ensure that none of their actions can be interpreted as deceitful to the detriment of customers, suppliers or third parties.
- 4) They will always maintain a relationship based on ethical behaviour and respect of the law with their customers, suppliers and business partners, obtaining from them collaboration with compliance with ARQUIMEA's policies, protocols and standards relating to the prevention of corruption, bribery and extortion.
- 5) Within the framework of the contracts concluded between ARQUIMEA and its customers, suppliers and business partners, ARQUIMEA's professionals will always maintain the will and commitment to comply with all agreements established in those contracts based on good faith and due diligence, and will not impede or encumber compliance with the Company's contracts and the obligations assumed in them.
- 6) They will not conclude, negotiate, accept or fulfil contracts or transactions in the name of ARQUIMEA without the necessary authorisation or power-of-attorney.
- 7) They will avoid the use of opaque structures for tax purposes, which are understood to be those that, through the use of shell companies in tax havens or territories that do not cooperate with tax authorities, are designed for the purpose of impeding authorities from determining the ultimate responsible person for the activities or the ultimate owner of the assets of rights involved.
- 8) They must inform the CEO, the Compliance Officer and the Legal Area at ARQUIMEA whenever they find themselves in any of the following situations as a result of their jobs at ARQUIMEA:
  - a) They are subject to investigation or questioning by any authority.
  - b) They are called to testify or provide documents to any state authority or regulatory entity.

- c) They are being investigated, called to testify or sued in any criminal, civil, administrative, arbitration or any other proceeding.
- d) They are the subject of a complaint or claim made by a customer, supplier or business partner.
- e) They have been offered any type of bribe, payment or money during the course of their professional activities.

## **5. Whistleblower Channel**

ARQUIMEA has its own Whistleblower Channel and has established the obligation for all of its professionals to report any event, action, conduct or omission that violate this Policy. Those reports will be handled with maximum confidentiality and will not cause any detriment to the reporting party who, with good faith, reports any circumstance that in his/her opinion could violate the law, ARQUIMEA's internal rules or, in particular, this Policy.

The Whistleblower Channel is accessible on the ARQUIMEA website in the space regarding the Compliance Program.



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