

PRP.01

CRIMINAL RISK PREVENTION POLICY

CHANGE CONTROL

SECTION	COMMENTS
Section 4	Revision of the members of the Compliance Body, and references to the Code of Conduct and Compliance Management Manual.

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1 PURPOSE

The purpose of this policy is to define and establish the Operating Principles that the Criminal and Anti-Bribery Compliance Policy Management System of DRACE GEOCISA consists of, the purpose of which is to transmit to all the administrators, directors and employees of the company – along with third parties that may be linked to the company – DRACE GEOCISA's firm commitment to monitor and punish any misconduct, whether criminal, antitrust or of any other kind, as well as to provide communication and awareness mechanisms to all employees in order to promote an ethical business culture and strict compliance with the law.

2 SCOPE

This policy applies to all executives, directors and employees of DRACE GEOCISA, S.A., its branches and its subsidiary companies (collectively referred to as "DRACE GEOCISA" or "the Company"), regardless of their area of activity or hierarchical level, whether at construction sites, factories, central headquarters, services, laboratories in the nuclear area and construction laboratories.

Likewise, it will be applicable to those individuals who act within and before other entities in the name of and on behalf of the Company, who in that case, and within their powers, must actively promote that the principles contained herein be applied

3 OPERATING PRINCIPLES

The Operating Principles governing the Corporate Criminal Risk Prevention Policy are:

- a) To integrate and coordinate the set of actions necessary to prevent, detect and act upon the possible commission of unlawful acts that may constitute a criminal or anti-trust risk, or any other type of risk.
- b) To create a climate of total transparency by means of establishing adequate internal channels to encourage early reporting of suspected irregularities. This includes the Ethical Channel, whereby any employee or third party who wishes to make a query in connection with the Code of Conduct, the Policies or the Regulations, or becomes aware of a breach thereof, or of any unlawful act committed in the Company, whether criminal, antitrust or otherwise, should report it to the Compliance Body in a fully guaranteed manner and without fear of reprisal.
- c) To act pursuant to the legislation in force, and specifically in accordance with the provisions of the Code of Conduct, the Policies and the Regulations.
- d) To establish protocols and training programs or any other method that may be appropriate for all managers, executives and employees, in order to promote a corporate culture of compliance and business ethics.
- e) To develop and implement effective internal control systems for preventing and detecting illegal actions or any other actions which contravene the provisions set out in the Code of Conduct.
- f) To conduct periodic supervision of the internal control systems in place.
- g) To ensure that the Compliance Supervisory Body has the necessary material and human resources to effectively carry out all the functions entrusted to it.
- h) To provide all the assistance and cooperation that may be required by judicial and administrative bodies, antitrust authorities, or national or international institutions and organisations for the investigation of allegedly criminal acts, or acts constituting breaches of

antitrust regulations, or otherwise irregular acts that may have been committed by its managers, executives and employees.

- i) To investigate claims of alleged irregular acts and practices, safeguarding both the confidentiality of the complainant and the rights of the persons under investigation, imposing where appropriate, in a fair, non-discriminatory and proportionate manner, any penalties that may be applicable in accordance with the legislation in force.

4 PRINCIPLES OF THE CRIMINAL AND ANTI-BRIBERY COMPLIANCE POLICY MANAGEMENT SYSTEM

The Criminal and Anti-Bribery Compliance Policy Management System of DRAGADOS, S.A. focuses on the analysis of potential criminal and anti-trust liabilities that may affect the company, together with the inventory of existing procedures and controls aimed at preventing, detecting and punishing any such criminal offences.

The Criminal and Anti-Bribery Compliance Policy Management System mainly consists of the following elements:

- **Code of Conduct:** DRACE GEOCISA belongs to DRAGADOS GROUP and has adhered to its Code of Conduct, which is aligned with that of ACS Group but has its own particularities as regards its activity. Consequently, the DRAGADOS Code of Conduct is applicable to all employees, managers and directors of the company. In addition, and given that DRACE GEOCISA belongs to the group of companies of ACS Actividades de Construcción y Servicios, S.A., ACS' Code of Conduct is also applicable.

Thus, the company establishes the core values, ethical principles and key guidelines that should govern all areas of action by all persons covered by the Code.

- **Code of Conduct for Business Partners:** DRACE GEOCISA, S.A., as part of Dragados Group, has a Code of Conduct for Business Partners which, in addition to containing the requirements resulting from the ACS Group's Code of Conduct for Business Partners, reflects the particularities resulting from the activity carried out by the Company.

Compliance with this Code is mandatory for all DRACE GEOCISA, S.A. Business Partners, regardless of their geographical location or the Group company which they maintain contractual relations with, who must expressly accept its contents by signing and undertaking to comply with it.

- **Ethical Channel:** DRACE GEOCISA, S.A. has an Ethical Channel which guarantees that any employee or third party who wishes to make a query related to the Code of Conduct, the Policies or the Regulations, or has knowledge of a breach of the same, or of any unlawful act committed in the Company, whether criminal, antitrust or of any other nature, must inform the company in a fully guaranteed manner and without fear of suffering any reprisal.

Management of this Ethical Channel is totally confidential and is entrusted to the Compliance Committee of DRAGADOS.

Any of the complaints included in this Policy may be made through one of the channels detailed below, and which are included in the *Dragados Ethics Channel Operating Policy*:

a) Ordinary Channels:

- Direct line manager or the Director concerned;
- Member of the Compliance Body;
- Compliance Department/Compliance Manager.
- By post to:

**To the attention of: Ethical Channel DRAGADOS Group
Avda. del Camino de Santiago 50, 28050 Madrid, Spain.**

b) Alternative Channels:

- The online channel accessible via the DRACE GEOCISA website and corporate intranet:

<https://www.drace.com/cumplimiento.html>

or directly via the following link:

<https://secure.ethicspoint.eu/domain/media/eseu/gui/108739/index.html>

- The 24/7 telephone channel;

<u>Country</u>	<u>Telephone number</u>
Spain	900 876 043

- **Compliance Management Manual:** This is the document in which the basic guidelines of the System for Criminal Compliance Management, Anti-Bribery and Fair Competition is established, with a view to assuring compliance with its Criminal Risk Prevention Policy and Anti-corruption Policy.
- **Compliance Body:** DRACE GEOCISA has designated DRAGADOS' Compliance Committee as its compliance body, a collegiate body responsible for the tasks of monitoring and controlling compliance with the Code of Conduct, and is made up of the Secretary General, the Resources Director, the General Counsel, the Internal Audit Director, the Compliance Director as well as an external Consultant specializing in Criminal Law.

The Compliance Committee holds independent initiative and control powers to prevent antitrust infringements or offences from being committed. It shall have sufficient human, financial and material resources to design, develop, implement, evaluate, maintain and improve the Criminal and Anti-Bribery Compliance Policy Management System, as well as the results thereof.

- **Compliance Directorate:** The Compliance Directorate of DRAGADOS shall carry out the functions related to DRACE GEOCISA expressly delegated to it by the DRAGADOS Compliance Committee, which may be, but are not limited to, the following:

- Develop, draft, implement and review the Criminal and Anti-Bribery Compliance Policy Management System.
- Carry out monitoring of the controls established in the Compliance Management Manual and, in general, of compliance with the same and with the values and ethical principles established in the Code of Conduct.
- Suggest to the Compliance Committee of DRAGADOS the complementary measures they deem appropriate to guarantee due compliance with the Criminal and Anti-Bribery Compliance Policy Management System throughout the organization.
- Reasonably ensure that the system of values set out in the Code of Conduct and the Criminal and Anti-Bribery Compliance Policy Management System be updated, proposing any necessary updates and integrations to DRAGADOS' Compliance Committee.
- Communicate immediately and unambiguously any violations of the Criminal and Anti-Bribery Compliance Policy Management System to the Compliance Committee of DRAGADOS.
- Periodically provide the DRAGADOS Compliance Committee with information on the reviewing activities carried out, as set out in the Compliance Management Manual.

In order to carry out the aforementioned functions, the Human Resources Director of DRACE GEOCISA shall provide the Directorate of Compliance of DRAGADOS with all the information available to her regarding compliance with and/or operation of the Criminal and Anti-Bribery Compliance Policy Management System of DRACE GEOCISA, S.A.

- **Training:** DRACE GEOCISA will promote the provision of proper training to all company personnel so as to transmit knowledge of its values and ethical principles, as well as the duties and operating principles derived from its Criminal and Anti-Bribery Compliance Policy Management System, with a view to preventing crimes or anti-trust breaches from being committed.

Likewise, the Criminal and Anti-Bribery Compliance Policy Management System will include each and every one of the company's policies, procedures, instructions and internal standards, which have been duly approved, are mandatory and are aimed at preventing crimes and anti-trust breaches from being committed.

5 MONITORING, ASSESSMENT AND REVIEW

This policy, as well as the Criminal and Anti-Bribery Compliance Policy Management System will be continuously monitored, assessed and reviewed, and particularly when legislative, social, organizational or any other type of circumstances may so require. In any case, this policy will be reviewed and assessed on an annual basis.

6 BREACH

DRACE GEOCISA will do its utmost to prevent any conduct which may constitute a breach of this Policy and/or the applicable legislation, as well as to interrupt and punish any conduct that

contravenes said regulations carried out by employees, managers and directors of the Company or third parties acting on behalf of the Company.

Failure to comply with the provisions of this Policy and applicable law may have serious consequences for the Company, its employees, managers and directors.

This policy has the status of a mandatory standard, so any breach thereof constitutes a violation of this policy and the Management will take appropriate disciplinary action, pursuant to applicable Labour Laws and to the Disciplinary Regime contained in the applicable Collective Bargaining Agreement, notwithstanding any other responsibilities that the offender may have incurred in.

Approved by the Sole Administrator on 20 April 2023