

ANTICORRUPTION POLICY

1. Why did TR create this Policy?

In line with our commitment to the Principle of Zero Tolerance for any type of corruption, this policy has been drawn up to describe those activities and behaviours that are not acceptable in our organisation, as well as the guidelines for action in the event of violation of this principle.

2. To whom is it addressed?

This Policy is addressed to all members of the Company and its business partners.¹

3. What is corruption?

It may be considered corrupt behaviour to offer, promise, grant, ask for or receive (directly or indirectly) an unjustified benefit or advantage of any nature with the intention of influencing the behaviour of a person, whether a public official or a third party external to the Company, to obtain a business advantage.

Both active conduct (performed by the one who offers or delivers the advantage or benefit) and passive conduct (performed by the one who claims or accepts the advantage or benefit) are considered corrupt; it makes no difference who takes the initiative to perform the corrupt act.

4. What is not allowed?

- Offering, paying or giving anything of value to a public official² or third party outside the Company to obtain business, undue advantage or any other benefit for TR.
- Offering, paying or giving anything of value to anyone when it is known, or there are reasons to suspect, that all or part of the payment may be channelled to a public official.
- Receiving or accepting something of value from a third party who may claim to be favoured or benefited in a business relationship.
- Influencing an authority and/or public official by taking advantage of any situation arising from a personal relationship with the latter or with another authority and/or public official to obtain a decision that may directly or indirectly generate an economic benefit for oneself or for a third party.
- Distorting or providing untrue financial or accounting information.
- Failing to maintain and record a true and fair financial and accounting statement.

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

²any person holding a legislative, executive, administrative or judicial office, appointed or elected, or any person performing a public function, including functions for a public body or for a public or state company, or any public official or agent of a national or international organisation or any candidate for public office. This is irrespective of whether he/she holds a position in a national, international, EU or non-EU body, administration or entity, or in other countries or territories.

As a general rule, it is not prohibited to offer or accept occasional gifts, meals, or entertainment that are of a reasonable value and comply with the Law and other internal rules, such as the Company's Gifts and Hospitality policy.

5. What forms may corruption take?

Cash or gifts handouts to a third party outside the Company or to their relatives, high commissions, personal favours, false consultancy agreements, political donations, facilitation payments³, extortion payments⁴, abuse of personal relationships with authorities or public officials if such relationships of kinship or affinity exist, etc.

6. Liability in the event that a third party engages in corrupt behaviour on behalf of TR.

From a legal perspective, the payment of a bribe or the performance of any corrupt act through a third party outside the Company is equivalent to it being performed directly by a TR employee. The Company and the third party face the same civil and criminal charges that would exist if the payments or corrupt conduct had been performed by TR itself.

7. What other policies have been implemented by TR to prevent and, where possible, avoid corrupt behaviour?

- Third Party Integrity Assessment Policy and Procedure.
- Policy on Relations with Public Officials.
- Gifts and Hospitality Policy.
- Conflicts of Interest Policy.
- Antitrust Policy.

These policies are available to any employee of the Company through the TR Group intranet and TR will distribute them to its business partners according to the specific circumstances of the business relationship established with them.

8. Reporting corrupt behaviour or inquiries.

If any employee becomes aware of or suspects any form of corruption, he/she must immediately report it to his/her immediate superior or to the Compliance Officer through the Whistleblower Channel:

<https://canaletico.tecnicasreunidas.es/tecnicasreunidas>

³ small value handout to a *Public Official* or to a person who has been assigned similar procedural or certification functions, to ensure or accelerate the performance of a routine action (e.g. obtaining a visa, building permits, registering of supplies such as water, electricity, telephone, etc.), and which does not entail a discretionary act on his/her part.

⁴ they consist in payments made to a third party under threat, extortion or any other circumstance that could endanger the integrity or life of those who must make them.

TR will not tolerate any reprisal against anyone who, in good faith, communicates facts that could be considered a breach of this Policy, and guarantees the confidentiality of these communications.

In addition, the following email address has been set up for queries, doubts, clarifications, etc. regarding interpretation and advice on the policies implemented in the Company relating to corruption:

compliance@tecnicasreunidas.es

9. What are the consequences of non-complying with this Policy?

Failure to comply with the provisions of this Policy may result in disciplinary sanctions in accordance with labour law and other civil and commercial obligations contracted by the employee.

In the most serious cases of non-compliance, there may be criminal consequences.

TR also reserves the right to take any action it deems appropriate against business partners who breach this policy.

10. Commitment from TR members

TR considers that compliance with this policy is the responsibility of all its employees and requires their commitment in this matter.

In this respect, TR is committed to promoting internal training in the prevention and the fight against corruption.

0.	Original Version	October 2018	October 2018	November 2018
1.	Update	May 2022	June 2022	June 2022
Rev.	Description	Regulatory Compliance Area	Audit and Control Committee	Board of Directors