



# CRIMINAL COMPLIANCE POLICY

25 January 2021

◆ CRIMINAL COMPLIANCE MANAGEMENT SYSTEM ◆

The mission of Grupo Sesé is to assist its clients, creating value in a sustainable way at every stage of the supply chain, with a **global, transversal and personalised service**, designing **competitive and innovative solutions** through:

- › A profitable and robust business model.
- › Teamwork, combining passion and commitment.
- › Creativity and technology applied to innovation.
- › Excellence in processes and management to maintain the highest level of service quality.
- › Solid, integral and transparent relations with its stakeholders.

This policy defines and expresses the objectives of our organisation in terms of criminal compliance, so that we reaffirm the values, principles and behaviours established in our **Code of Ethics and Conduct** and our **Integrated Management Policy**, which we must bear in mind in the exercise of our activities and in our relations with our stakeholders.

Against this background, Grupo Sesé undertakes the following:

- 1** To effectively implement and develop ethical behaviour and compliance with the requirements of the Criminal Compliance Management System (CCMS) and require the **maximum compliance with criminal legislation** applicable to the members of the organisation regardless of the place they occupy in the organisational chart and the geographical location where they provide their services.
- 2** To work with **"Zero Tolerance" regarding any illicit or criminal act** related to our business activities or contrary to the values, principles and behaviours set out in our Code of Ethics and Conduct, both by members of the organisation and by our business partners or, in general, by any of our stakeholders.
- 3** **Not to accept conduct involving the commission or risk of commission of any of the offences** contemplated on our criminal risk map.
- 4** **Not to tolerate conduct that could constitute any form of corruption or bribery**, whether it involves an official or authority, or a company, whether in national or international transactions, and must at all times act with respect for fair competition between companies and the civil service.
- 5** To set up a Criminal Compliance Management System (CCMS) that establishes and maintains the mechanisms and procedures necessary to **anticipate, evaluate, prevent and manage criminal risks** associated with the performance of our activity, establishing the necessary means to **minimise the organisation's exposure** to these risks.
- 6** To appoint a **Criminal Compliance Body** which, under the supervision of the Board of Directors is responsible for monitoring the operation and compliance of the CCMS, guaranteeing for the exercise of its functions, the following **principles of authority, leadership, independence and autonomy**, and providing it with sufficient material, training and economic resources.

- 7** To train, raise awareness and sensitise members of the Organisation and, eventually, business partners as a springboard for:
- ▶ promoting a true culture of ethics and compliance in our Organisation and to disseminate it among our stakeholders,
  - ▶ presenting the key elements of criminal liability of the legal entity,
  - ▶ stating the crimes and the activities which they are associated with and the organisation's criminal risk map,
  - ▶ reporting on the consequences of non-compliance,
  - ▶ and reporting on responsibilities in relation to the CCMS.
- 8** To enable and maintain a **channel for complaints and queries**, as well as establish the internal regulations that develop it, regulating the rights and obligations of users, guaranteeing, for example, the right to:
- ▶ confidentiality and the protection of personal data,
  - ▶ objectivity and independence of judgement in decision-making,
  - ▶ the presumption of innocence,
  - ▶ and a non-retaliation guarantee for persons who report facts in good faith.
- To inform and make employees aware of the **obligation to use** this channel when there is a breach, or a risk of such, in the Code of Ethics and Conduct, in the CCMS, in the internal rules and controls or when an illegal or criminal offence is committed (or there is a risk of such commission).
- 9** To adopt the **appropriate disciplinary measures** in the event of breaches in the Code of Ethics and Conduct, the CCMS, internal rules and controls or the commission of an illegal act or offence, which will be considered a very serious breach of contractual good faith as set out in art. 54.2 of the Workers' Statute (or equivalent local legislation in each country) and other applicable and concordant legislation. This is without prejudice to the responsibilities of any other nature to which the acts committed may have given rise.
- 10** And against this background, the commitment is assumed to provide the CCMS with indicators to monitor its operation and ensure its effective implementation, development and **continuous improvement**, in such a way that:
- ▶ it helps us to work in line with a philosophy of self-improvement,
  - ▶ it ensures robust and stable processes,
  - ▶ it pursues excellence in both our business and management model,
  - ▶ and serves as a frame of reference to establish and review our Criminal Compliance objectives.

This policy will be reviewed periodically and must be complied with by the members of the Organisation, as well as by those persons who act in the name of or on behalf of the organisation in the normal course of their activities and transactions for our organisation. And for your knowledge and application, we communicate and distribute this policy through the channels established in our Communication Plan.

"We Are Leaders, We Are Different"



Grupo Sesé Managing Director  
Ángel Pueyo Alonso