



GRUPO
AZVI

Crime Prevention & Detection Policy

This document is a summary of the main features of the Azvi Group's Crime Prevention and Detection Policy.
All queries and clarifications concerning the same may be notified through the Ethics Channel of the Azvi Group's Regulatory Compliance Department.

Crime Prevention & Detection Policy

1.- GENERAL CONSIDERATIONS

2.- PURPOSE

3.- AREA OF APPLICATION. BASIC TECHNICAL RULES

4.- MISSION, VISION AND CORPORATE VALUES

5.- CRIME CATALOGUE

6.- PRINCIPLES OF ACTION

7.- ORGANISATION

8.- COMMUNICATION OF SUSPICIOUS ACTS OR CONDUCT

1.- GENERAL CONSIDERATIONS

From its very beginnings and throughout its entire track record, the AZVI GROUP has conducted its business in a highly ethical manner and considers regulatory compliance as one of the key factors that have enabled it to achieve its excellent reputation.

Promoting, fostering and maintaining this ethical conduct and a culture of regulatory compliance constitute one of the fundamental pillars of the AZVI GROUP's identity, which means that all activities and efforts aimed at preventing acts that could be described as criminal must be necessarily made by all the people who comprise the Group, from the directors through senior and middle management to the employees in general.

This culture of compliance and ethical conduct must also be harmonised with the specific legal context in which the Group operates. The previously voluntary values of compliance and ethical conduct has now become an essential requirement for proper protection of the AZVI GROUP against the criminal risks arising from potential commission of crimes by people who form part of our organisation.

The AZVI GROUP's Crime Prevention and Detection Management System - of which this Policy constitutes the backbone - has been designed and implemented with this goal in mind. The entire organisation (directors, managers and employees) and the natural and legal persons with which the AZVI GROUP is related in the course of its operations must perform their activities within the guidelines set forth in this Crime Prevention and Detection Policy.

The Crime Prevention and Detection Policy expresses the unequivocal will of the AZVI GROUP to detect, report, prevent and reveal all undue, illegal or negligent conduct and activity in general on the basis of the principles and criteria of action set forth herein, without prejudice to specific developments of the same in the documents that compose the Crime Prevention and Detection Management System.

Any member of the AZVI GROUP who infringes the principles of this Crime Prevention and Detection Policy shall be liable to prosecution under the entire range of punitive measures provided for by the Spanish criminal code such as fines or imprisonment, disqualification and claims for loss and damage, in addition to the appropriate internal disciplinary measures (as required, including disciplinary dismissal).

Members of the AZVI GROUP who disobey the rules and principles set forth in this Policy and in the other regulatory documents of the Crime Prevention and Detection Management System may, under no circumstances whatsoever, claim to have acted in favour of the interests of the companies of the AZVI GROUP for which they provide services, since any infringement of the internal or external rules and regulations is detrimental to the AZVI GROUP and any such claim shall be rejected out of hand. There is no higher interest than respect for the applicable regulations and the values and principles that the AZVI GROUP has adopted and which are embodied in the Crime Prevention and Detection Management System.

2.- PURPOSE

The purpose of this Crime Prevention and Detection Policy is to inform all the AZVI GROUP's directors, managers and employees and related third parties of the Group's firm opposition to the commission of improper, illegal or negligent actions and that the Group is determined to combat and prevent all conduct contrary to the applicable regulations and to the principles and values that the AZVI GROUP has adopted.

Therefore, this Policy is an expression of the firm commitment of the AZVI GROUP to detect, prevent and condemn illegal acts and conduct, to implement and maintain effective mechanisms for communication, training and awareness of all directors, managers and employees in this area to develop a business culture of regulatory compliance, ethics and honesty.

3.- AREA OF APPLICATION. BASIC TECHNICAL RULES

This Policy applies to all directors, managers and employees of the AZVI GROUP. All members of the organisation must be familiar with the Crime Prevention and Detection Policy and Management System and comply with their content regardless of the position they hold in the organisation.

This Policy is also applicable to all companies that form part of the AZVI GROUP at any time. Additionally, the activities where crimes may be committed are those related to the construction, concession, transport and railway maintenance business lines, together with the central corporate services, all of which are specifically detailed in the Crime Prevention and Detection Manual.

This Crime Prevention and Detection Policy is based on and responds to the requirements set forth in the following regulations:

- UNE-EN ISO 19601:2017, "Management System for Criminal Compliance. Requirements with guidance for use".
- UNE-EN ISO 37001:2017, "Anti-bribery Management System. Requirements with guidance for use".

4.- MISSION, VISION AND CORPORATE VALUES

The corporate culture of the AZVI GROUP strives for sustainable development. AZVI GROUP aim to satisfy our stakeholders with dynamic and efficient organization and a firm commitment to continued improvement through the integration in our activities, as a socially responsible company, of not only economic but also, social, environmental, workplace health and safety, ethical and transparency criteria.

Mission

To be leaders in the execution, promotion and management of projects in the construction, real

estate, concession, industrial and services sectors.

Vision

Creating value for our shareholders, personnel, customers and social environment while contributing to sustainable economic growth and social welfare.

Corporate values

- Satisfaction of stakeholders' needs and continuous improvement of results.
- Promotion of irreproachable ethics and a culture of work well done in all our activities.
- Development and continuous improvement of its management systems in search of excellence, fostering innovation, individual initiative and teamwork.
- Social responsibility vis-a-vis the environment and society and commitment to sustainability, reconciliation of work and family life, equal opportunities, regulatory compliance in all areas, safety as a priority and commitment to stakeholders.

5.- CRIME CATALOGUE

The criminal categories set forth in the "General Risk Assessment of the Crime Prevention and Detection Management System" GAZ.ER.06 are those to which it is considered that the companies of the AZVI GROUP are exposed in accordance with the different applicable Criminal Code (the "AZVI GROUP Crime Catalogue"), on the basis of the risk analysis and assessment performed by the AZVI GROUP. Since it is based on an assessment that takes criteria of probability and severity into account on the basis of the activities in which the companies of the AZVI GROUP are currently engaged, this list does not pretend to be exhaustive or closed. The full list of acts for which a legal person may be criminally liable is set forth in the Criminal Code.

All Subject Persons are therefore required to know and comply with the laws and to refrain from performing acts that infringe the same regardless of whether they are listed in the AZVI GROUP Crime Catalogue or not.

This means that all members of the AZVI GROUP must be alert to potentially criminal conduct according to the regulations.

The criminal liability of the legal person does not alter or modify the criminal liability of the natural person: both responsibilities may coincide in the same person. Consequently, a natural person who is the material perpetrator of the crime shall be exposed to the associated criminal liability under the Criminal Code without limitation.

6.- PRINCIPLES OF ACTION

The following principles of action inspire the AZVI GROUP's Crime Prevention and Detection Management System:

- I. The AZVI GROUP will not tolerate, permit or engage in any kind of criminal activity in general and specifically in corruption, extortion or bribery when performing its business activity in either the public or in the private sector.
- II. The AZVI GROUP defends and fosters a preventive culture based on the principle of “zero tolerance” of business-related corruption in all its forms and commission of other criminal and fraudulent acts and situations, and on the application of ethical principles and on the responsible and unimpeachable conduct of all the Group’s professionals regardless of their hierarchical level.
- III. This principle of “zero tolerance” of criminal acts is absolute and takes priority over any kind of actual or potential direct or indirect economic or other benefit for the AZVI GROUP or for its professionals on the basis of a criminal act, illegal business or transaction or conduct contrary to the ethical principles set forth in the Code of Ethics.
- IV. The relations between the AZVI GROUP’s professionals and the public administrations, authorities, officials and other persons who participate in the exercise of the public function, including political parties and similar entities, shall be governed at all times by the principles of cooperation, propriety, transparency and honesty. The companies of the AZVI GROUP have specific procedures to prevent any act that may be considered to constitute corruption, bribery or any other criminal offence, and their application is supervised by the Crime Prevention and Detection Committee, its support bodies and the governing bodies of the companies that form part of the Group.
- V. The AZVI GROUP fosters the participation of its professionals in suitable training programmes, both face-to-face and on-line or any other appropriate method, at sufficient intervals to ensure that their knowledge in this field is suitably updated. In particular, the professionals of the AZVI GROUP shall be trained in the Crime Prevention and Detection Management System to prevent, detect and report any connotations of criminal acts, fraud, corruption or bribery.
- VI. The AZVI GROUP fosters an environment of transparency and maintains adequate internal channels to facilitate notification of potential irregularities and which enable the Group’s stakeholders to report, under the appropriate conditions, conduct that may entail an infringement or commission by an AZVI GROUP professional of illegal acts or conduct that contravenes the rules of action of the Code of Ethics.
- VII. AZVI GROUP undertakes to refrain from adopting any form of direct or indirect retaliation against persons who report the commission of irregular conduct or infringements, including breach of the rules of action of the Code of Ethics, by reporting the same through the dedicated communication channels or by any other means, unless they have acted in bad faith.

Implementation of these principles, the essential basis of which is set forth in this Crime Prevention and Detection Policy, is the responsibility of the AZVI GROUP’s Crime Prevention and Detection Management System, which is aimed at preventing, detecting and managing the criminal

risks by integrating said principles into the business processes and measuring their effectiveness to ensure continuous improvement.

7.- ORGANISATION

The AZVI GROUP has set up a Crime Prevention and Detection Committee to which criminal prevention functions have been assigned and which is responsible for putting this Policy into effect by implementing the measures provided for in the AZVI GROUP's Crime Prevention and Detection Management System that supports it. The Crime Prevention and Detection Committee is conceived as a collegiate body made up of managers and directors of the most important departments and areas with respect to the activity of the AZVI GROUP.

It has the following functions:

- To foster and continuously monitor the implementation and effectiveness of the Crime Prevention and Detection Management System in all areas of the organisations.
- To ensure that continuous training support is provided to the relevant members of the organisation.
- To ensure the inclusion of responsibilities for the prevention and detection of criminal acts in job descriptions and performance management processes.
- To implement a crime prevention and detection information and documentation system.
- To adopt and implement processes to manage the relevant information.
- To set up and analyse performance indicators for the prevention and detection of criminal acts to identify the need for corrective actions.
- To identify and manage criminal risks including those related to business partners.
- To ensure that the Crime Prevention and Detection Management System is reviewed at planned intervals.
- To ensure that employees are provided with access to crime prevention and detection resources.
- To inform the Board of Directors on the results of application of the Crime Prevention and Detection Management System.

The Crime Prevention and Detection Committee is ultimately responsible for the supervision, monitoring and control of the external and internal crime prevention and detection obligations in the organisation. It has, as a collegiate body, sufficient resources and personnel with the appropriate skills, status, authority and independence to fulfil these tasks.

The Crime Prevention and Detection Committee has direct, immediate access to the Board of Directors when the former needs to notify suspicious acts or conduct or matters related to the goals of prevention and detection of criminal acts and therefore, of the Crime Prevention and Detection

Policy and the Crime Prevention and Detection Management System, and to report any information and proposal that it deems appropriate.

The Crime Prevention and Detection Committee occupies a position in the organisation that empowers it to request and receive the full collaboration of the other bodies of the same.

The Regulatory Compliance Department is responsible to the Crime Prevention and Detection Committee which technically supports the former in the maintenance, supervision and control of application of the Crime Prevention and Detection Management System.

8.- COMMUNICATION OF SUSPICIOUS ACTS OR CONDUCT

All AZVI GROUP's directors, managers and employees have the duty to report on individual and group conduct or activities in the context of their functions that may entail infringement of the content of this document or the other documents of the Crime Prevention and Detection Management System, regardless of whether such conduct has been ordered or requested by a superior.

The AZVI GROUP has several internal reporting and communication mechanisms. Any queries, observations and/or reports by employees regarding criminal prevention may be notified through these channels.

GRUPO
AZVI //