



**CRIMINAL  
RISK AND  
ANTI-BRIBERY PREVENTION POLICY**

# Object

In its commitment to comply with the legislation in force and our ethical principles, the governing body of CLECE provides the necessary resources to develop, implement and maintain a criminal compliance management system to prevent, detect and react to any criminal risk in general, and of bribery in particular, related to the company’s business and processes.

The principles and values of CLECE, among others, are transparency and legal fulfilment, respect and dignity for people, respect for human rights and public liberties, honesty, good faith, exemplary behaviour and common sense.

# Scope

This Integrated Criminal Risk and Anti-bribery Prevention Policy is applicable to all members of CLECE, that is, the governing body, executives, employees, workers, temporary employees, those under collaboration agreement, volunteers and all other persons under hierarchical subordination to any of the above, even though they may not have a legal-labour relationship with CLECE, whenever they perform activities there on a regular basis. It is also applicable to subsidiaries of CLECE that adhere to its criminal risk and anti-bribery management system.

# Objectives

The main objectives of this Policy are:

* To follow the criteria of the Code of Ethics that records the commitment by CLECE to the principles of corporate ethics and transparency in all its fields of action and to regulate ethical, responsible behaviour by all the professionals at CLECE in performing their activity, and the consequences arising from non-compliance.
* Implementation and effective development of an ethical culture and compliance with the law among all the members of CLECE, regardless of the place of work and the location where they perform their duties.
* Zero tolerance in relation to any criminal or illicit act, or that is contrary to the values and principles of the Code of Ethics, not only among CLECE employees, but also temporary employees, under collaboration agreement, volunteers, Temporary Consortia, clients, users, providers and subcontractors with which CLECE establishes professional and/or commercial relations, with the final objective of ensuring that such relations are always informed by the ethical values of CLECE by an efficient action that focuses on excellence and quality in all its services.
* Appointment of a collegiate body for criminal compliance in matters of crime prevention, including bribery, providing it with sufficient material and human resources to carry out its task, encouraging ongoing training in order to assure leadership, autonomy and independence in exercising the office, reporting directly to the Governing Body.
* Adequate communication, training, awareness and consciousness for the members of CLECE and eventually business partners and other interest groups that require such, regarding the content, requisites and nature of the criminal compliance management system, in order to achieve maximum efficiency and develop an ethical and legality compliance culture in performing our activities.
* Creation of an Ethical Channel and internal regulations to regulate the management, processing and formalities of communications received regarding incidents and/or breaches of the criminal compliance and anti-bribery management system, guaranteeing respect for concurrent fundamental rights, especially confidentiality.
* Establishment of procedures to develop and monitor the criminal and anti-bribery
* compliance system, with the aim of achieving their effective management by establishing the appropriate indicators to evaluate the degree of effective implementation, non-conformities and corrective actions, within an ongoing review and improvement process.
* Adoption of the relevant disciplinary measures for eventual risks and breaches of the criminal compliance and anti-bribery management system, as well as any illicit or criminal conduct being committed, to which ends this shall be considered a very severe violation due to breaching contractual good faith. All this is notwithstanding any other type of legal or contractual liabilities that may arise from such behaviours.

**This Policy shall be reviewed periodically for its ongoing adaptation; its fulfilment being mandatory for all CLECE staff as well as all persons performing activities on behalf of the Organisation. Companies that collaborate with CLECE shall be provided a copy of this policy to promote lines of action in keeping with it. They must all know and apply it within their scope of professional action.**

**Signed: Cristóbal Valderas Alvarado**

**ACS Servicios y Concesiones, S.L.:**

**Sole Administrator of CLECE, S.A.**