

# CRIMINAL RISK PREVENTION POLICY



The Criminal Risk Prevention Policy includes PRODESA's commitment to zero tolerance and opposition to the commission of any unlawful act and to maintain at any given moment a corporate culture of honesty, integrity and ethical conduct. This Policy is fostered by the Board of Directors and Management, and must be complied with by each of the persons who make up the Company.

## COMMITMENTS OF CRIMINAL RISK PREVENTION POLICY

- ✓ Understand and strictly comply with prevailing legislation in the area of the undertaking of their activities, as well as compliance in its entirety with the obligations and commitments assumed in their contractual relationships with any third party.
- ✓ Make available all the necessary means and resources to foster, where appropriate, the prevention, control, identification and punishment of unlawful or unethical acts or conducts which may be committed within the Company.
- ✓ Compliance with the general principles for crime prevention included in the Criminal Risk Management System Manual and compliance with the Code of Conduct.
- ✓ Maintain honest and impeccable conduct in all its activities, avoiding all forms of corruption and complying at any given moment with the particular circumstances and needs of all stakeholders involved in the Company's business and professional activities.

As a sign of this strong commitment, PRODESA has set up a Criminal Risk Management System, appointing a Compliance Committee, with autonomous independent powers of initiative and control, responsible for the development, monitoring and follow-up of the system.



The strict compliance with legal requirements, the Code of Conduct, as well as the remaining internal regulations is obligatory for Company members; in such a way that the appropriate disciplinary measures shall be adopted, on a case by case basis, in order to penalise any infringement for these purposes.



Likewise, PRODESA has a Whistleblower Channel, as a strictly confidential communication channel which is made available to all Company members, who are under the obligation to report any suspicion or awareness of the undertaking of any unlawful or unethical activities within PRODESA.