



# Anti-corruption Policy Sener Group

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The SENER Group Anti-Corruption Policy aims to inform all the managers and professionals of the companies that form part of the group, as well as third parties that are related to such companies, our principle of zero tolerance and strict opposition to any act of corruption or offer, delivery or acceptance of a benefit understood as a bribe, regardless of local legislation and/or customs. We are determined to prevent and combat any act of corruption in all activities, thus contributing to the fulfillment of the sixteenth objective of the Sustainable Development Goals (SDA) adopted by the United Nations.

This Policy develops a practical guide for the application of this principle within the framework of the professional activities carried out by its professionals, collaborators, managers and partners, and regulates their relations with the authorities, clients and third parties, especially when they act on behalf of one of the group's companies.

This Anti-Corruption Policy constitutes a commitment to permanently monitor possible corruption acts and conduct, to communicate and raise awareness among all professionals and to develop an ethical and honest business culture.

This policy applies to SENER Group directors, officers, managers, professionals and collaborators at all its controlled entities in which it is responsible for the management, as well as at all its international subsidiaries.

This document is also a call to all people in SENER Group, and especially to those with management responsibilities, to behave in an exemplary manner in this matter.

The principles included in this Anti-Corruption Policy are specified in the SENER Group Compliance System and in the Crime Compliance Programs implemented in the different group companies.

# I. Action principles

SENER Group establishes the following fundamental action principles in the field of corruption prevention:

1. It does not accept, tolerate, carry out or engage in acts of corruption or bribery, either directly or indirectly, and totally rejects any act contrary to national and international anti-corruption standards.
2. It complies with all national and international legal provisions regarding the prevention and detection of corruption and bribery, promoting their integration into the company's business and support processes.
3. The ethical culture and compliance with anti-corruption regulations take precedence over commercial aspects, hence SENER Group does not, under any circumstance, pay or will pay any type of bribe even if this means losing opportunities or projects.
4. It promotes the use of the Ethics Hotline as a means of communication between the Corporate Compliance Body and the company's stakeholders, through which it is possible to consult on ethical issues, communicate possible practices associated with corruption and/or irregular events or conduct in general.
5. It promotes internal training in the prevention of and fight against corruption, as well as disseminates the principles embodied in this Policy to Third Parties.

## II. Guidelines to implement this Policy

The following are a series of guidelines for correct decision-making to prevent corruption within the activities carried out by people in SENER Group, whether in internal operations or in our relations with authorities and third parties.

### Corruption in a few words

Corruption is fraudulent behavior that undermines fair corporate practices, sustainable development and democratic processes, and goes against transparency, market equality and public resources. Therefore, this behavior can take place within the environment of a natural or a legal person, and both in public entities and private companies.

This behavior includes any kind of bribery, fraud, embezzlement or facilitation payment that speeds up a specific administrative practice or process<sup>1</sup> through public employees. Any act carried out directly or through an intermediary that is contrary to the rules of fairness and ethics could be considered as corruption.

### Our commitment within SENER Group

With the objective of preventing and fighting corruption:

1. It is forbidden to deliver, promise or offer any type of payment, commission or remuneration to any person or company with the aim of obtaining any kind of direct or indirect benefit for a SENER Group professional, or for any SENER Group company. Such deliveries, promises or offers are also prohibited if they are made indirectly through partners, collaborators, agents, intermediaries, advisers or appointed persons.
2. It is forbidden to accept or receive any payment, commission or remuneration from any person, whether in the public or private realm, to facilitate or ensure commercial advantages and successes for a third party inasmuch as the SENER Group professional or any of the SENER Group companies can obtain any kind of direct or indirect benefit.
3. However, it is accepted to give or receive gifts or presents which, owing to their market value being within the limits established in the Gifts and Hospitality Procedure and/or because they are clearly of a personal nature, would not be able to affect the impartial criteria of the decisions to be taken by any of the SENER Group companies or a third party.
4. Any request from a third party for payments, commissions, gifts or remuneration such as those mentioned in the previous paragraphs must be rejected and brought to the attention of the supervisor, as well as any act that generates any doubt and may involve corrupt practices by SENER Group professionals or third parties with whom it has a contractual relationship. Both the group professionals and any third party may also communicate their doubts or concerns through the SENER Group Ethics Hotline<sup>2</sup>.

### Our relations with the Public Administration

1. It is forbidden to give, promise or offer any kind of payment, commission, gift<sup>3</sup> or remuneration to any Public Administration entity, public official or employee or director of public entities and agencies, either directly or indirectly through related persons or companies, and which is addressed to a public official or employee or another person indicated by said public official or employee.

<sup>1</sup> When these processes are not duly regulated and their official prices or rates are not published openly to any interested party.

<sup>2</sup> The Ethics Hotline allows queries to be made and possible breaches of the Code of Conduct to be reported confidentially and without fear of reprisals. It is managed by the group's Compliance Body and is available 24 hours a day, 7 days a week through the corporate website (<https://www.group.sener/ethics-hotline>).

<sup>3</sup> This prohibition does not include gifts made in accordance with the provisions of the SENER Gifts and Hospitality Procedure.

2. Facilitation payments are forbidden in any territory, regardless of the local customs and practices. The term facilitation payment means any type of unofficial payment made to a public employee to secure or expedite a necessary procedure or action to which he or she is entitled without the need for such payment.
3. Influence peddling is prohibited, regardless of local customs and practices, when this has an influence on decision making, generating favorable treatment or providing privileged information to benefit the interests of Grupo SENER.

## **Our requirements regarding relations with third parties**

1. No contractual relationship may be established with a third party if it does not know and accept to comply with the SENER Group Code of Conduct, and therefore with this policy. Our relations with third parties must be within the framework of the SENER Group Code of Conduct, as well as internal rules and procedures, identifying those with the greatest risk of incurring corrupt practices.
2. It is not possible to formalize a contractual relationship with third parties without ensuring that their level of demand in terms of ethics and compliance is in line with what all SENER Group companies accept as an unquestionable commitment. Therefore, the due-diligence processes defined for this purpose should be applied, which allow us to know in a preliminary manner and to a reasonable extent, the greater or lesser risk of corruption -among others- that working with certain third parties implies.

## **III. Validity and updating**

This version of the Anti-corruption Policy was approved by the SENER Grupo de Ingeniería, S.A. Board of Directors on 16 of december 2020.

This version will remain in force until it needs to be revised in accordance with future legal modifications and updates or changes that occur within the Group's operations and businesses, which will lead to the editing and publication of a new version

**SENER IN THE WORLD**

[www.group.sener](http://www.group.sener)