



Grupo Sener
Compliance Policy
Version 1.0

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I. Introduction

Based on a culture of ethics and established transparency, supported by strong corporate values for more than 60 years, this document embodies a general vision of the Compliance Policy of Grupo SENER (the “Group” or “SENER”), aimed at its professionals and other interest groups in order to make known its configuration, organization and main components.

Among SENER’s objectives are adopting and implementing measures and controls that contribute to preventing or mitigating risks that could arise from criminal conduct

or irregular behavior. This entails seeking to promote and ensure the legality of the actions that, in the exercise of their professional activities, SENER’s professionals, partners, directors and shareholders carry out.

To this end, SENER has implemented an organization and compliance management system - structured in three blocks or components - whose purpose is to prevent and detect risks inherent in the activity through a series of general and specific controls.

II. Scope of application

This policy applies to SENER board members, administrators, directors, professionals and third parties at all its subsidiaries

where it is responsible for management, as well as at all its international affiliates.

III. Action principles

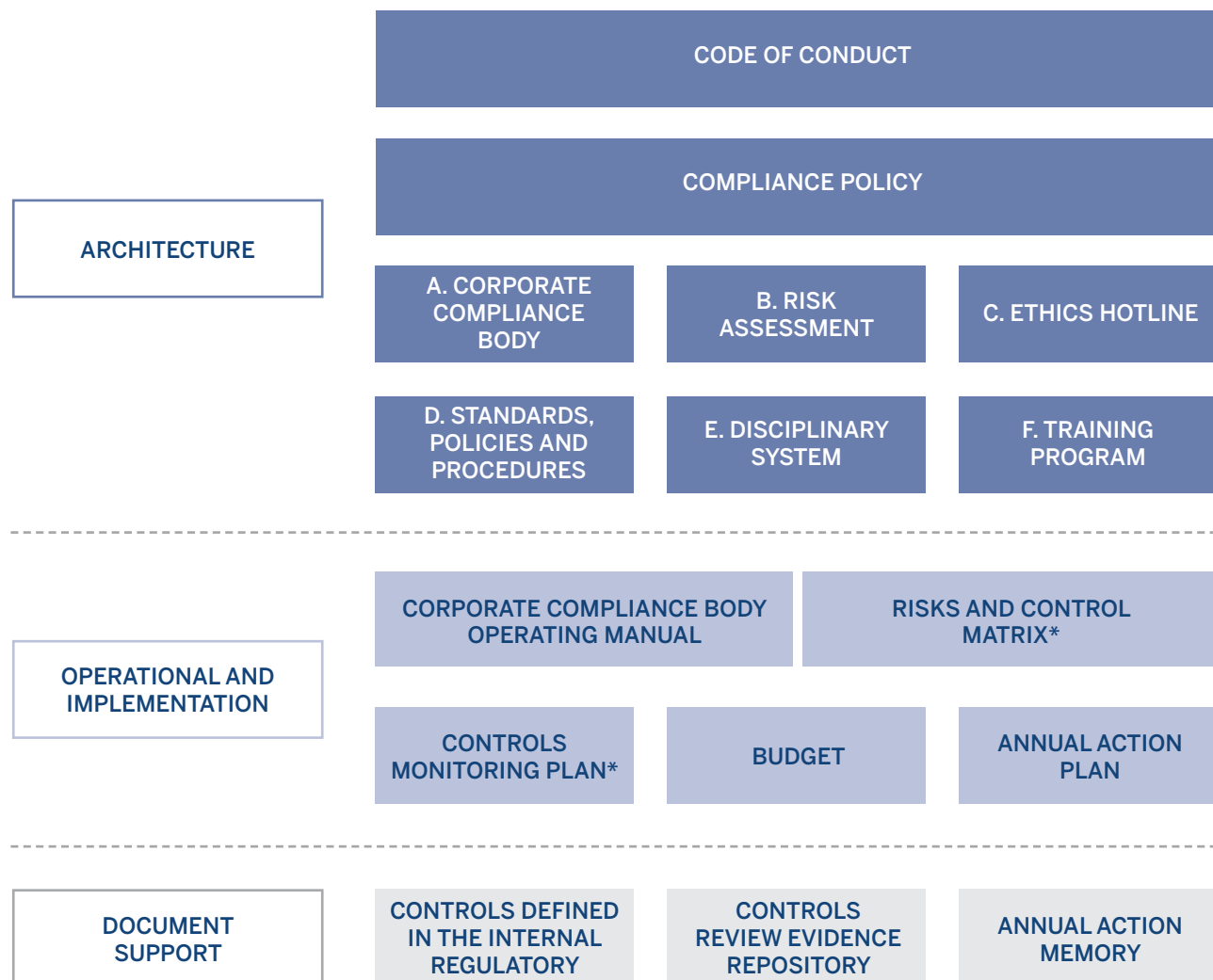
SENER establishes the following fundamental action principles in regard to compliance:

1. Complying with all external legal provisions and internal regulations, encouraging their integration into business and support processes at the company.
2. Opposing any irregular behavior or any potential criminal act by its employees or professionals connected to SENER, regardless of their hierarchical level and implementing at all times the current disciplinary system. This requirement applies in the same way to any third party with which the company plans to establish some type of short-term contractual relationship.
3. Promoting SENER’s culture of ethics and transparency in all its actions, through the different processes of the company and the structural elements of the Compliance System.
4. Encouraging the use of the Ethics Hotline as a means of communication between the Compliance Body and the interest groups of the company, enabling asking questions about ethical issues and/or reporting possible irregular activity.
5. Periodically reviewing the compliance risks map and specific associated controls with the aim of preventing the occurrence of these risks and minimizing exposure to them.
6. Deploying training plans for SENER board members, administrators, directors, professionals and third parties that enable integrating regulatory provisions and their updates into the daily activity of the company.
7. Having the necessary material and human resources to be able to carry out the Compliance Function effectively and tailored to the needs of the company and the business operations.
8. Overseeing the continuous improvement of the compliance model through monitoring, streamlining and synchronization of the system.
9. Guaranteeing the autonomy, objectivity and transparency of the Compliance Body, which is the professional association with the authority and independence needed to manage the compliance system.

IV. Configuration of the Compliance System

The SENER Group Compliance System is based on three main elements or building blocks:

- Architecture elements
- Operational and implementation elements
- Document support elements



* It is defined for each of the Crime Compliance Program

V. Compliance System Objectives

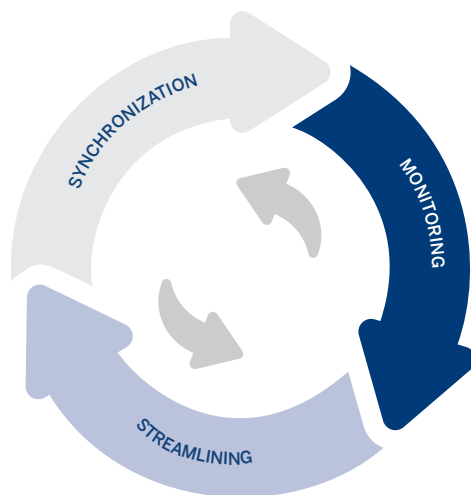
The Compliance System at Grupo SENER, through its managers, must meet out the following high-level objectives:

- Promoting the dissemination, knowledge and compliance with SENER's Code of Conduct and the rules and procedures related to compliance and crime prevention and detection.
- Monitoring the functioning, efficiency and compliance with the Crime Compliance Programs.
- Implementing and developing the appropriate adaptations of SENER's Crime Compliance Programs.
- Encouraging a preventive culture based on the principle of "zero tolerance" for the commission of unlawful acts and fraud; as well as on the application of the principles of ethics and responsible behavior of all SENER professionals and its subsidiaries, regardless of their hierarchical level and the country where the work.
- Reviewing internal procedures to verify their validity and effectiveness, as well as to improvement of planned controls for preventing inappropriate behavior in those procedures.
- Encouraging the preparation and implementation of training programs, in person or online or through any other method adequate to the responsibilities contained in the Code of Conduct and the Crime Compliance Program, as well as applicable legislation, with sufficient frequency to ensure that knowledge about this matter is updated. In particular, the professionals at the companies of the Group will receive training in the Code of Conduct and the Compliance Policy, as well as in the legal and regulatory requirements that apply to their position.
- Establishing the tools needed to record the actions that make up SENER's Compliance System.

VI. Compliance System Priorities

The Compliance System is responsible for three priority areas to which it devotes a good part of its time and resources:

1. Monitoring and verification of controls, both general and other specific controls associated with each risk. One should note here the activity related to the receipt and analysis of the responses received in compliance questionnaires, as well as in the review of the results of the questions posed through specific third-party monitoring tools.
2. Streamlining currently established controls, including new or better controls that help detect and/or prevent irregular behavior and the commission of misdeeds more efficiently.
3. Synchronizing the current compliance program in such a way that the variations that occur over time in SENER's activities, businesses operations and in its processes are transferred to the defined controls.



VII. Validity and updating

The board of directors of SENER Grupo de Ingeniería, S.A. approved this version of the Compliance Policy on December 18, 2019.

The Compliance Policy version will remain valid until it needs to be revised in accordance with the changes and legal updates that occur in the future or with changes in the main businesses of the Group, which will result in the preparation and publication of a new version.

SENER IN THE WORLD

www.group.sener