

ANTI-CORRUPTION Policy

Principles of bribery control

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01. Object

To establish mechanisms to control and prevent bribery and/or corruption situations in GLOBALTEC.

Since its foundation in 2007, GLOBALTEC is fully committed to carry out its professional and business activities in an honest, integral, ethical and responsible way, complying with the law in force and applicable at all times.

Therefore, this document aims to create an insurmountable reference framework for the prevention and detection of corruption and bribery activities in GLOBALTEC's operations and to promote full compliance with the company's anti-corruption and anti-bribery regulations.

02. Outreach

All employees of the company, regardless of their area of activity or hierarchical level. It shall also apply to those persons acting within and before other entities, in the name and on behalf of Globaltec, as well as suppliers and customers.

03. Reference documentation

- Standard UNE-EN-ISO 37001: 2016.
- Procedure PC09 "Management of purchases".

04. Zero tolerance principle

We define bribery as any offer, promise, giving, acceptance or solicitation of an undue advantage of any value (which may be of financial or non-financial in nature), directly or indirectly, and regardless of its location, in violation of applicable law, as an inducement or reward to a person to act or refrain from acting in connection with the performance of that person's duties at Globaltec.

Globaltec has a zero tolerance principle for such behaviour, which means that any suspected incidents of corruption or bribery will be investigated and any misconduct may result in disciplinary action for the organisation's employees, including dismissal in serious cases, criminal charges, termination of contract or other sanctions in the case of professional services, partners, suppliers or even customers.

Globaltec will conduct all its activities in accordance with the anti-corruption and anti-bribery legislation in force in all areas of its activities and in all countries in which it operates, in accordance with its spirit and purpose.

Please, refer to the Code of Conduct for more information on corruption and bribery and the corresponding sanctions.

This principle, as well as the entire contents of this document, should be known and applied by all at Globaltec, including its partners/shareholders, management members and all employees (in whatever form of employment), who should ensure that they do not engage in bribery activities in any way, and are committed to understand, accept and apply the principles set out in this document.

Globaltec delegates to the Sustainability Committee, described in our Code of Conduct, the task of monitoring and controlling compliance with this bribery control. To this end, the Sustainability Committee and its officers, the Sustainability Coordinator, have autonomous powers of initiative and control to prevent the commission of offences or irregular actions that may lead to actions in breach of this document, as well as our Code of Conduct.

05. Communication

Globaltec management directly, or the Sustainability Committee, is committed to communicate the principles set out in this document to all Globaltec personnel, subcontracted personnel where they exist, customers, suppliers, business partners, and third parties where appropriate.

At the time of the draw up of these principles, when any modifications take place and when hiring or subcontracting new employees, as part of their on-boarding process, they shall be informed of these principles and of their related information, such as specific procedures according to the area of responsibility (e.g. purchasing), the code of ethics and the disciplinary code, etc.

06. Facilitation payments

A facilitation payment, more colloquially denominated as a bribe or a kickback, is a small, unofficial and improper payment made to an official to obtain or expedite a routine or necessary procedure for the activity. Facilitation payments can be given to officials to obtain licences, permits, certificates and other types of public services, but also to commercial service providers.

Public official or civil servant means "any person holding a legislative, administrative or judicial office, whether by appointment, election or as a successor, or any person exercising a public function, including for a public body or a public corporation, or any officer or agent of a local or international public organisation, or any candidate for public office". Within the scope of the principles of bribery control at Globaltec, we extend the concept of public official and apply it to any person who can "facilitate" the procedures outlined above, whether belonging to a public or a private body.

Facilitation payments are bribes and involve corrupt conduct. They are therefore prohibited at Globaltec.

Extortion payments. There may be circumstances in which a Globaltec member finds himself or herself in the situation of being requested a facilitation payment accompanied by a threat to his or her security or the one of others. In this case, it is extortion behaviour. In such cases, the facilitation payment may be allowed to be made to avoid serious harm, provided that such threat and fear of imminent danger can be demonstrated.

This payment has to be recorded in the company's accounts, together with an explanatory report of the situation.

Where appropriate or if required by law, the authorities must also be informed.

07. Gifts, hospitality and other

Relationships between GLOBALTEC and its customers and suppliers can be strengthened through gifts, invitations to events, travel or other benefits.

Such actions may be accepted and even advisable for the strengthening of the relationships, or they may represent a conflict of interest and be perceived as bribery.

To avoid misunderstandings, possible bribery, and to control such behaviour, the following principles are established, which can and should be communicated internally and to other stakeholders for the knowledge of what is acceptable and what is not acceptable by GLOBALTEC.

7.1. Gifts

- It is possible to give or receive modest and common practice gifts: pens, mugs, T-shirts, etc. An equivalent value of 200 euros is established as a reference.
- Under no circumstances may a gift in the form of money or equivalent (e.g. gift cards) be given or received.
- Only gifts or other hospitality may be offered or accepted if they do not violate the law or are not prohibited under a contract.
- Gifts or invitations may not be accepted or given from/to the same person more than 4 times per year.
- The cumulative value of the gifts received or made by one person from the same company or person may not exceed 400 euros per year.
- No gifts should be given or accepted during or immediately after the negotiation of a contract.
- Gifts should not be accepted from or offered to those directly involved in the award of contracts, approval of certificates, or otherwise, for at least 12 months before and after said award.
- Any gift made or received must be able to be made in public.

In all other circumstances, the management approval is required in order to make or receive a gift.

7.2. 7.1. Invitations

Invitations may be made or received provided that:

- They are related to a legitimate business purpose. For example, an invitation to a congress where Globaltec or the client is exhibiting a product or service.
- They are infrequent (no more than 1 per year to the same person or company)
- They are appropriate in the context of the business

The following is not acceptable:

- Excessive invitations
- Invitations involving indecent, obscene or violent behaviour.
- Invitations that violate third parties' policies, or applicable laws.

7.3. Travel

- Travel invitations can only be made when they are necessary for the proper progress of a project.
- If they occur, only the expenses associated with travel and accommodation will be included.
- The payment of entertainment expenses is prohibited.
- The payment of expenses to relatives or friends of the person involved is prohibited.

7.4. Charitable contributions

Charitable contributions must meet the following criteria:

- Charitable donations will only be made to charitable organisations.
- No donations may be offered or made without first informing the Sustainability Committee.
- Charitable contributions should be offered in an open and transparent manner.

This document recognises the rights of the employees and officers of the organisation to make charitable donations in their personal capacity. Such donations are permitted provided that it is absolutely clear that the person making the donation does not represent the company in such action.

7.5. Political contributions

GLOBALTEC will not make contributions or donations to political parties, directly or indirectly, in any case and under any circumstances.

This document recognises the rights of the employees and officers of the company to make political contributions in their personal capacity. Such contributions are permitted but subject to it being absolutely clear that the person making the contribution does not represent the company in the said action.

7.6. Sponsorship activities

A sponsorship activity is defined as financial or other support given to an organisation or a person to carry out the activity to which it is dedicated.

Sponsorship activities shall respect the following rules:

- The partners linked by sponsorship contracts shall be known, reliable and of excellent reputation.
- The sponsorship activities shall be made in accordance with the approved budget.
- The sponsorship activities that are not included in the budget must be approved in advance by the Sustainability Committee.
- Sponsorships should be offered in an open and transparent manner.

7.7. Record Book

All expenses that may be incurred, such as invitations, gifts, etc., as set out above, shall be recorded and accounted for in accordance with the established legality.

08. Conflict of interest

A conflict of interest exists when a person at Globaltec has professional, personal or private interests that deviate from the interests expected of him or her when representing the company, i.e. when the person's interests conflict with those of Globaltec, and he or she may therefore make decisions that are not in the best interests of the company.

Conflicts of interest are common. They must therefore be addressed and tackled. The management of the company, or the body delegated by it, shall decide whether or not there is a conflict of interest for the employee in the situations listed below:

- Gifts or invitations not mentioned above in this document
- Appointments or positions in other companies in the sector
- Financial investments in Globaltec's suppliers and/or customers
- Offering jobs to family members

All decisions that may involve a conflict of interest in the above terms must be justified and documented as evidence of Globaltec's commitment to anti-corruption. It is also a record of the conflict or absence of the conflict of interest, and therefore of the correctness or otherwise of the employee's behaviour.

09. Partners, agents and intermediaries

GLOBALTEC must require from its partners, agents and intermediaries anti-bribery principles equivalent to those set out above.

GLOBALTEC must ensure by contractual clause, the termination of the relationship between the parties in case the partner, agent and/or intermediary is involved in bribery or there are clear indications of this.

10. Due diligence

GLOBALTEC expects and requires from its employees to conduct due diligence on potential bribery risks. This implies that the individuals' behaviour in the company should be geared towards identifying, preventing and mitigating situations of bribery and corruption. Prevention includes a duty of information, for example:

- Reporting on a possible corrupt behaviour that may lead to bribery
- Reporting on applicable improvements of the anti-bribery management system
- Reporting on new threats that may emerge over time
- Reporting on the absence of contractual clauses
- Reporting on the absence of legality in third countries, Etc.

Failure to exercise due diligence may have disciplinary consequences. Please, refer to the ethics and disciplinary code for more information.

11. Training

GLOBALTEC will promote appropriate training for all company employees in the knowledge of its ethical principles, as well as the duties and principles of action derived from its Code of Conduct and its principles of Bribery Control.

12. Reporting irregularities and queries

Any employee or third party who has knowledge or reasonable suspicion of a breach of these Principles should bring it to the attention of their line manager or report it through the Ethics, Communication and Whistleblowing Channel, which can be accessed via the following link: <https://globaltec.ethic-channel.com/home>.

This channel is both a means of reporting non-compliance with the rules set out in this document and a means of resolving any doubts that may arise from the application of the established principles.



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Thank you for all your support
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