

Anti-corruption policy

June 2018 (v1)

Contents

0.	VERSIONS.....	3
1.	OBJECTIVE AND SCOPE OF APPLICATION	4
2.	APPLICABLE PRINCIPLES.....	4
3.	IMPLEMENTATION.....	5

0. VERSIONS

Version	Date	Amendments
01	27 June 2018	Initial version. Approved by the Board of Directors

1. OBJECTIVE AND SCOPE OF APPLICATION

The objective of this policy is to reaffirm the FCC Group's commitment to compliance with regulations and the development of ethical behaviour in its business activities in accordance with the principles set out in the Code of Ethics and Conduct, wherein fraud and corruption are not tolerated and which are applicable to all employees and companies of the group over which direct or indirect management control is exercised.

2. APPLICABLE PRINCIPLES

In order to prevent corruption, the FCC Group will carry out all its activities in accordance with current legislation governing all areas of activity and in all the countries in which it operates, and is committed to compliance with the following principles set out in the Code of Ethics and Conduct of the Group.

1. **Compliance with legislation and ethical values.** Comply with current legislation and internal regulations, acting in accordance with the values and the Code of Ethics and Conduct of the FCC Group.
2. **Zero tolerance to bribery and corruption.**
 - a. Zero tolerance: Promote a culture that is opposed to both bribery and corruption, where it is prohibited to influence the will of third parties in order to gain an advantage, preferential treatment or a guarantee of obtaining benefits for the company.
 - b. Giving and receiving of gifts and invitations: Avoid the undue delivery and/or receipt, directly or indirectly, of commissions, payments or gifts that will benefit FCC's operations.
3. **Prevention of money laundering and transparent communication.** Avoid payments and collections in cash, monitoring the origin and purpose of the funds in order to comply with regulations on money laundering and/or financing of terrorism.
4. **Transparent relationship with the community.** Avoid undue payments such as facilitation payments to public officials, undue payments under the guise of donations, or direct or indirect financing of political parties, representatives or candidates.
5. **Conflicts of interest.** Act with loyalty and defend the interests of the FCC Group, avoiding any situations that could give rise to a conflict between personal interests and those of the Group, whether through activities or operations outside the group or as a result of personal or economic interests associated with Group transactions. Any conflict of interest should be reported through the Channels set up for this purpose.
6. **Monitoring of the ownership and confidentiality of data.** Comply with all regulations regarding Information Security and Data Protection in force, following and respecting the Group's measures for preventing outside parties and employees from gaining unauthorised access to information and/or data.

7. **We are diligent in terms of control, reliability and transparency.** Reflect faithfully and adequately all actions, operations and transactions of the Company in its books and records, in accordance with the principle of control, reliability and transparency of the Group's information.
8. **Extension of our commitment to our business partners.** Guarantee that the FCC Group establishes commercial relationships with partners that demonstrate ethical behaviour and a high level of commitment that guarantees stable commercial relationships, thus avoiding a lack of integrity of the persons or entities with which business is conducted.
9. **Promotion of continuous training on ethics and compliance** for all employees of the FCC Group, paying special attention to the fight against fraud and corruption, as well as providing the necessary human and material resources for this policy to be disseminated efficiently, as well as implementing measures for the prevention and detection of criminal activities.

In the event that any employee has knowledge or suspicions of any form of fraud or corruption, he or she must immediately inform the FCC Group via the Whistle-blowing Channel so that, on the basis of Due Control, the Corporate Compliance Officer can communicate the facts to the Compliance Committee and initiate the corresponding inquiries and investigations to clarify the facts.

The FCC Group will not tolerate any retaliation against anyone who, in good faith, communicates events that could constitute a breach of this policy or the Code of Ethics and Conduct. Employees who violate these provisions will be subject to the corresponding disciplinary measures, including termination of their contract, as well as other possible actions and/or legal penalties.

3. IMPLEMENTATION

The FCC Group has various mechanisms to ensure adequate implementation of the Anti-Corruption Policy, as well as to prevent, detect, investigate and penalise cases of fraud and corruption, including:

- **Compliance Committee**, which will ensure the proper functioning of the Criminal Prevention Model, monitoring the applicable regulations, the risks and the effectiveness of the controls, as well as fostering a compliance culture.
- **Code of Ethics and Conduct** made available to all Group employees, which includes the principles and rules of conduct applicable that are mandatory for all employees of the FCC Group.
- **Whistle-blowing Channel** at corporate level. Managed by the Corporate Compliance Officer and the Compliance Committee, through which employees can channel or report possible breaches of the Code of Ethics and Conduct or activities carried out that involve criminal misconduct or fraudulent or corrupt actions. The notifications or complaints received will be analysed and investigated by the Corporate Compliance Officer (for further details see the Whistle-blowing Channel Procedure and the Investigation and Response Procedure).

- **Policies and procedures.** Identification of the risks and controls aimed at preventing criminal activity, which, if necessary, will enable the Group to free the legal entity from liability.
- **Manifestation of acceptance.** The group will periodically require all its employees to formally state that they have knowledge of and comply with the principles established in the Code of Ethics and Conduct and the Anti-Corruption Policy and will provide the necessary training for the policies to be understood and complied with.