



CRIMINAL COMPLIANCE AND ANTI-BRIBERY MANAGEMENT POLICY

ESCRIBANO MECHANICAL & ENGINEERING, LTD management, pursuing the highest standards of quality, has decided to implement an integrated system based on the UNE - ISO 19601:2017 "*Management system for criminal compliance*" and ISO 37001:2017 "*Anti-bribery management systems*" standards.

The purpose of this Policy is to reaffirm **ESCRIBANO MECHANICAL & ENGINEERING, LTD** commitment to full compliance by all the Company, managers and workers, with locally applicable Anti-Bribery and Criminal Laws. This Policy complements the Code of Ethics and Professional Conduct and provides a framework for the fulfilment of company policies applicable to the operations of **ESCRIBANO MECHANICAL & ENGINEERING, LTD** worldwide.

The aim of **ESCRIBANO MECHANICAL & ENGINEERING, LTD** is to combat, prevent and prohibit the commission of any illicit or bribery act therein. This policy, therefore, implies a commitment to monitor and punish criminal acts and criminal behaviour, to maintain the management system and to develop a business culture focused on ethics and honesty.

The principles governing the Criminal Compliance and Anti-Bribery Management Systems implemented in **ESCRIBANO MECHANICAL & ENGINEERING, LTD** are:

- Establish a policy and guideline structure for the approval and deployment of treatments plans aimed at mitigating and minimizing the company's risks.
- Implementation of the necessary actions to prohibit and prevent the commission of illegal acts, bribes and/or corruption.
- Commitment to addressing risks that may affect the organization, through the identification, management and control of the different activities of the organization.
- Management commitment to implement a continuous improvement on Criminal Compliance and Anti-Bribery Management System.
- Establish, and periodically review, criminal compliance and anti-bribery objectives appropriate to the purpose and context of the organization.
- Encourage the reporting of possible irregularities, via the whistleblowing channel, on which any employee or interested third party can report acts of which they have knowledge, as well as concerns in good faith or on the basis of a reasonable belief, in trust and without fear of reprisal.
- Investigate any complaint submitted while ensuring the confidentiality of the complainant and the rights of the persons concerned.
- Take disciplinary actions, in accordance with the provisions of the legislation applicable at any given time, for conducts intended to prevent or hinder the detection of crimes and the failure to report a criminal act.
- Provide the material and human resources, authority and independence to the Committee of Compliance so that they can conduct the task entrusted to them.

ESCRIBANO MECHANICAL & ENGINEERING, S.L reiterates its commitment to comply with all the points established in this Criminal Compliance and Anti-Bribery policy, as well as with the requirements established in both management systems.

Alcalá de Henares, 27 March 2019

Ángel Escribano Ruiz

CEO