

# Anti-corruption policy

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# Introduction

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Tecalis takes an active position of rejection of corruption in all its forms, and works under the basic principle of compliance with the laws and regulations in force at all times, basing its actions on the highest responsible standards.

As part of its commitment to reduce corruption, Tecalis is one of the firms officially adhered to the United Nations Global Compact, making a commitment to the UN to align its operations with Ten Universally Accepted Principles, including working against corruption in all its forms, including extortion and bribery (Principle No. 10), and taking action in support of the UN goals currently embodied in the Sustainable Development Goals (SDGs).

Within this framework, the Board of Directors of Tecalis approves this Anti-Corruption Policy as an essential tool to prevent both the Company and its external collaborators, directly or through interposed persons, from engaging in conduct

that may be contrary to the law or to Tecalis' basic principles of action: respect, integrity, collaboration, good business practices, transparency, excellence, professionalism, confidentiality and social responsibility. This Policy complements the company's Code of Ethics, Conduct and Business Principles.

We are against corruption in any form and we are very firm against bribery in order to contribute to good governance, economic development, social welfare progress wherever we operate and do business. In the event that local laws are stricter than this Anti-Corruption Policy, those laws shall apply.

We do not pay bribes or accept bribes, nor do we induce or allow third parties to pay bribes, making or receiving bribes on our behalf.

We are committed to working in an ethical, legal, and professional manner, and we have transferred this commitment to the products, technological developments, and services we provide, to ensure that our technology is socially responsible and leaves a positive mark on society, as well as to guarantee the transparency, quality and safety of all technology from Tecalis.

# Our goal

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To reiterate Tecalis' firm commitment to strict compliance with the regulations on the prevention and fight against corruption by developing the principles contained in the organization's Code of Ethics and Conduct and Business Principles, and extending their compliance and application to all Tecalis companies, their employees, managers and members of the governing bodies.

In addition, Tecalis will share this Policy with those companies in which it holds a significant interest even if it does not have control, encouraging them to adopt it.

The Anti-Corruption Policy will be available to all Subject Persons, through the Tecalis internal website, which must be used by all of them in the course of their work for the organization, and in a public way through the Tecalis Corporate Website.

All Tecalis employees and members of the Management Bodies are **Persons Subject** to this Policy. Subject Persons will receive training aimed at ensuring adequate knowledge of the Policy to ensure the development of an ethical culture of integrity and compliance.

If these code-affected subjects have knowledge, doubts or suspicions regarding any form of corruption, they must immediately report it to the management of the area to which they belong and to the CSR management. The company will not tolerate any retaliation against anyone who, in good faith, reports facts that could constitute a breach of this policy.

Tecalis shares this Anti-Corruption Policy, within a framework of mutual trust and collaboration, with all its Associated Persons, in the expectation that they will take the appropriate measures to ensure fair behavior and competition in the market, provided that the specific existing circumstances so permit.

**Associated Persons** are suppliers, partners, contractors, agents, distributors, collaborators, persons who provide their services through temporary employment agencies or through academic agreements, non-operated joint ventures and other collaborating companies and intermediaries and agents acting in the name or on behalf of Tecalis. All of them will be made aware, through the organization, of the existence and content of this Policy. If this is not possible, Tecalis will promote that they are governed by conduct and values similar to those reflected in this Policy.

Tecalis will ensure that Associated Persons (suppliers, contractors, etc.) are selected through a fair, honest and transparent procurement process.

The knowledge of express non-compliance with any of the provisions of the of the Policy shall result in the termination of the contractual relationship. existing. Failure to comply with the provisions of this Policy may result in the exercise of disciplinary authority by the internal bodies empowered to apply it.

## Our commitment

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Tecalis rejects all forms of corruption by applying a zero-tolerance approach to any breach of this Policy.

In order to prevent corruption, Tecalis will conduct all its activities in accordance with the legislation in force in all areas of operation and in all countries in which it operates, in keeping with its spirit, CSR philosophy, and purpose, and is committed to:

- » Not to influence the will or objectivity of persons outside the Company to obtain any benefit or advantage through the use of unethical practices and/or contrary to applicable law.
- » Not to give, promise or offer, directly or indirectly, any property of value to any natural or legal person, in order to obtain undue advantages for the organization.
- » Do not promote Lobby Payments to facilitate a routine activity for which there is already an entitlement. Facilitation payments, where not prohibited, should be properly authorized, accurately documented, recorded, properly accounted for and substantially limited or phased out. Facilitation payments, even if not prohibited, should not be a pretext for bribery.
- » Not to finance or otherwise support, directly or indirectly, any political party, its representatives or candidates.
- » Do not accept gifts, entertainment and hospitality as a pretext for bribery.
- » Do not use donations to cover up improper payments.
- » Do not promote Charitable Contributions as bribery: Promise, give, or solicit charitable contributions or participate in charitable sponsorships as a pretext for bribery.
- » Not to request or receive unduly, directly or indirectly, commissions, payments or benefits from third parties on the occasion of or with a cause in the investment, divestment, financing or expenditure operations carried out by the Company.
- » Pay special attention to those cases in which there are indications of lack of integrity of persons or entities with whom business is conducted, in order to ensure that Tecalis establishes business relationships only with qualified and reputable persons and entities.
- » Provide financial and accounting procedures, including a system of internal control, reasonably designed to facilitate documentation and maintain fair and accurate books and records, accurately and adequately reflecting all actions, conducting periodic reviews and monitoring of the internal control system to assess compliance with these policies.
- » Periodically provide awareness and/or culture-building covering these policies for all Subject Persons and Associates, as appropriate to their role.
- » Promote internal training in the prevention and fight against corruption.
- » Review existing and potential business relationships with third parties, as appropriate, to assess and address the risk of third-party corruption.

## What do we mean by:

**Corruption:** offering, promising, granting, receiving, soliciting or accepting an unjustified benefit, for oneself or for a third party, to unduly favor another in the acquisition or sale of goods, in the contracting of services or in relationships commercial.

**Asset of value:** cash or cash equivalent, gifts, loans, gratuities, advantages or benefits of any kind.

**Bribery:** Engaging in any form of bribery, including offering, promising, giving, accepting or soliciting payments designed to gain any improper business advantage.

**Facilitation payment:** a small payment made to lower-ranking public officials to expedite or facilitate the performance of their responsibilities, such as access to public services, obtaining of ordinary licenses or business permits, administrative formalities, the provision of police protection or the loading and/or unloading of goods.

**Extortion:** whoever, for profit, forces another, with violence or intimidation, to perform or omit a legal act or business to the detriment of his patrimony or that of a third party.

**Hospitality:** Assumption of certain expenses on the part of the event organizer.

**Gift:** gifts, services, advantages, favors, provisions free of charge or any other physical present or pecuniary donation (payments or commissions).  
Travel and hospitality expenses are excluded, with their own regulation in this Anti-corruption policy.

**In Force:** The Anti-Corruption Policy has been approved by the Tecalis Board of Directors and ratified by the signature of representatives of different strategic areas of the company in an extraordinary session held on November 2, 2020, and will come into force on November 3, 2020.