

INTEGRATED COMPLIANCE, ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

The Aegea Group, through its Integrated Compliance, Anti-Bribery and Anti-Corruption Policy, aims to:


- ▶ Ensure that administrators, employees and business partners comply with the Aegea Group's compliance obligations and observe the requirements of the Anti-Bribery and Anti-Corruption Laws, as well as the Aegea Group's compliance, anti-bribery and anti-corruption policies and procedures, in order to guarantee that, when conducting business, the highest standards of integrity, fairness, accountability, legality, ethics and transparency are adopted;
- ▶ Ensuring compliance governance principles and demanding compliance with anti-bribery and anti-corruption laws, as well as any compliance obligations, whether legal, regulatory or contractual requirements, relevant to its activities;
- ▶ Have a zero-tolerance approach to bribery and other acts of corruption, emphatically prohibiting its directors, employees and business partners from paying or receiving bribes;
- ▶ Ensure that the Compliance Function is exercised by a person with competence, position, authority and independence, with direct access to the Board of Directors, the Audit, Risks and Internal Controls Committee and Senior Management;
- ▶ Ensure that no administrator, employee or business partner is retaliated against or penalized due to delay or loss of business resulting from their refusal to negotiate, offer, promise, receive, facilitate, pay, authorize or provide kickbacks, bribes and undue advantage;
- ▶ Encourage people to report, in good faith, or based on a reasonable belief in trust, through the relevant communication channels, any issues related to indications of inappropriate conduct, whether by administrator, employee, public agent or business partner, without fear of retaliation, including breaches of the Integrated Compliance, Anti-Bribery and Anti-Corruption Policy and the Aegea Group's compliance obligations;
- ▶ Register, analyze and investigate any reports referring to cases of non-compliance, bribery or corruption, adopting preventive controls to avoid their occurrence and corrective controls to avoid their repetition;
- ▶ Explain to each person the consequences defined in their disciplinary process for not complying with laws and regulations or with ISO 37301 and ISO 37001 standards and with the Aegea Group's own requirements, as set out in its policies and in its compliance, anti-bribery and anti-corruption procedures;
- ▶ Ensure a continuous and up-to-date awareness and training process on its compliance, anti-bribery and anti-corruption policies and procedures, emphasizing the obligation and commitment of each one to ethics, integrity, transparency, good governance, accountability, sustainability, honesty and exemplarity;
- ▶ Continuously improve the SIG - Integrated Compliance and Anti-Bribery Management System;

This policy applies to all administrators, employees and business partners with whom the Aegea Group maintains or will maintain any type of relationship, including the organizational units.

Board of Directors

July/2022

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