

OUR AMBITION

Our ambition at **SYSTRA SUBTERRA Engineering** is to be a leading team in geological engineering and consulting solutions, tunnels and underground works. This ambition cannot be achieved without business ethics and compliance (E&C); That is why we act at all times with professionalism, fairness and integrity in all negotiations and business relationships.

OUR GOALS

We are convinced that becoming a leading firm in the fight against bribery will allow us to:

- ❖ Attract customers we trust to grow a sustainable business.
- ❖ Generate investment and build strong relationships with trusted partners who share our vision of ethics.
- ❖ Improve employee confidence in **SYSTRA SUBTERRA**, increasing motivation and attraction.

OUR COMMITMENTS

- ❖ Prohibit any act of bribery and form of corruption and implement mechanisms to prevent, detect and punish bribery in all its forms.
- ❖ Act with impartiality, transparency and ethical behavior in all activities carried out or executed. Failure to comply with this policy and applicable legal regulations will be considered serious misconduct and disciplinary measures will be applied in accordance with applicable law. **SYSTRA SUBTERRA** is entitled to report any identified illegal acts to the competent authorities.
- ❖ Continuously improve the anti-bribery management system and comply with the requirements of the management system and local legislation on the prevention of bribery and anti-corruption.
- ❖ Encourage all interested parties to report acts or suspicions of bribery and/or violations of this policy, guaranteeing confidentiality and protection of whistleblowers against possible retaliation, through the following communication channels: ethics@systra.com, <https://subterra-ing.com/canal-de-consulta-y-denuncia/>
- ❖ Guarantee the authority and independence of the person responsible for the anti-bribery function, for the implementation, monitoring and operation of the anti-bribery management system.
- ❖ The collaborators of **SYSTRA SUBTERRA** or any third party acting on their behalf, are strictly prohibited from offering, granting, soliciting or accepting, either directly or through a third party, benefits, gifts and/or hospitality that are intended to obtain a benefit, present or future, for **SYSTRA SUBTERRA**, for themselves or for a third party; such as officials and/or public servants, foreign jurisdictions and/or International Organizations, which grants it in the contracting of goods, services or in the resolution, management or processing of files or decisions of any nature.
- ❖ Promote and strengthen an integral and responsible organizational culture, through awareness and permanent training of personnel on issues of prevention of acts of bribery, in order to minimize risks and guarantee an ethical and transparent work environment.
- ❖ Communicate and ensure the availability of this policy to its workers and relevant stakeholders.

José Miguel Galera
CEO SYSTRA SUBTERRA