



CRIMINAL COMPLIANCE POLICY

FHECOR Ingenieros Consultores, S.A., is a consulting entity specializing in structural engineering, which considers regulatory compliance to be a basic element of corporate social responsibility.

Our Criminal Compliance Policy is based on the following commitments:

Require all members of the organization to comply without exception with the legal requirements and the commitments established in this policy.

Identify, analyse and evaluate criminal risks in all our activities.

Establish measures to minimize exposure to criminal risks.

Establish reporting channels for possible acts or conduct suspected of non-compliance.

Define the expected behaviour of the members of the organization through a Code of Ethics.

The creation of an Ethics Management Committee.

Punish non-compliance and promote compliance.

In order to guarantee its independence, the Compliance Function will depend on and report to the CEO.

Guarantee the independence of the Compliance Function.

Implement a Criminal Compliance Management System that allows continuous improvement of system performance and compliance performance.

The provisions of this Policy and the Criminal Compliance Management System are mandatory for all FHECOR members. All of them have the obligation to report any suspicious event or behaviour as soon as possible.

In Madrid on May 25, 2022

Signed.:

Mr. José Romo Martín

CEO of FHECOR Ingenieros Consultores, S.A.