

COMPLIANCE AND ANTI-BRIBERY POLICY

INCATUK is strongly committed to implementing an efficient Compliance and Antibribery Management System and is one of our main objectives. During our more than three decades of presence in the market we have made our best efforts to meet our clients' expectations within the legal framework of each country where we operate and be successful in our activity.

The Integrated Management System seeks:

- ✓ To constantly increase the competence of the organization.
- ✓ To create strategic alliances with the best suppliers worldwide.
- ✓ To plan excellence in the execution of our projects.
- ✓ To guarantee regulatory compliance and fight against corruption.
- ✓ To have human teams committed to the future of the business and proud to be members of INCATUK.

Therefore INCATUK voluntarily assumes the following commitments:

- The corporate strategy of INCATUK is based on a management oriented to achieve our clients' satisfaction within the regulatory and statutory requirements applicable.
- Zero tolerance with the commission of offences and acts of corruption as well as with the commitment of the Organization to the enforcement of applicable legislation, promoted and supported by the Management in the continuous improvement of the Management System, providing supervision, revision and update mechanisms.
- The Management establishes objectives for compliance and anti-bribery in line with the purposes of the organization and makes available the necessary resources.
- INCATUK has appointed a Compliance Officer responsible for the control and followup of the effective implementation and execution of the Compliance and Anti-bribery Management System. Such body has full authority, independence and autonomy when developing its duties. The Compliance Officer reports to the Board of Directors.
- INCATUK's staff is duly informed and is bound to act according to the Ethic Code and Compliance Policy as well as to inform of any deficiency, irregularity, breach or improvement of the System through the Whistleblowing Channel. The channel can be accessed through the website, by mail (Poeta Joan Maragall Street, 1, 28020 Madrid), by e-mail (compliance@incatuk.com) or by requesting a meeting with the Compliance Officer, which will be arranged within seven days.
- INCATUK has approved a disciplinary system applying sanctions to those acting against the law or commitments assumed.
- This policy is available on the <u>Web Page</u> of the Company. The policy is available in Spanish and it is translated to English, French and Portuguese for those non-Spanish speaking countries.