

Zero
Tolerance
to Corruption Plan (PTCC)

Table of contents

1. General principles	3
2. Commitments	4
Bribes	4
Donations to political parties and other organisations	4
Preferential treatment	5
3. Application	6
Reports	6

1. General principles

SEIDOR S.A., (hereinafter, SEIDOR) is a company that has a corporate Code of Conduct in which it makes a number of commitments that extend to all of its partners and employees. It therefore requires its employees and partners to be honest, transparent and impartial in doing their jobs.

Among the commitments made is the fight against corruption in any shape or form, as reflected in its Code of Conduct. This commitment translates into the following general principles:

- ✓ **SEIDOR IS AGAINST ALL FORMS OF CORRUPTION, WHETHER DIRECT OR INDIRECT.**

- ✓ **SEIDOR HAS IMPLEMENTED A PLAN TO FIGHT AGAINST CORRUPTION CALLED THE ZERO TOLERANCE TO CORRUPTION PLAN (PTCC).**

2. Commitments

On the basis of an analysis of the activities most exposed to the risk of corruption and in line with the rules of its Code of Conduct, SEIDOR has committed to the following for conducting its business:

Bribes

SEIDOR prohibits all forms of unlawful payments, whether in cash or of any other kind, with the aim of obtaining an unfair advantage in its relationships with its stakeholders, whereby the concept of “advantage” is understood to mean preferential treatment or the assurance that gains will be obtained. This prohibition naturally applies to any employees who, by virtue of the functions and activities they carry out at the company, intend to accept and/or offer bribes for their own gain or that of their family members, associates or acquaintances.

In the event that bribes are promised, offered or requested, SEIDOR’s employees must report this to their line manager and senior management via the channel put in place for handling reports.

Donations to political parties and other organisations

SEIDOR refrains from exercising any type of unlawful pressure, whether direct or indirect, on politicians; it does not fund political parties, their representatives or candidates in Spain or abroad; nor does it sponsor any event whose sole purpose is political propaganda.

Any potential situations observed of such a nature that go against the law must be submitted for a preliminary review by SEIDOR’s Governing Body.

Preferential treatment

SEIDOR does not authorise the offer or acceptance, whether direct or indirect, of payments or benefits of any amount for the purpose of expediting services rendered by its stakeholders.

In the event that preferential treatment is promised, offered or requested, the company's employees must report this to their line manager and the Compliance Committee via the channel put in place for handling reports.

No gift of any kind may be accepted that could be interpreted as going beyond normal business practices or courtesy, in any shape or form, whose intention is to be given preferential treatment in conducting any business that could be linked to SEIDOR. Specifically, it is prohibited to give any kind of gift to Spanish or foreign public officers, auditors, company directors, inspectors or their families that could influence their freedom of judgement or lead to or ensure any type of favour.

It should be pointed out that a gift is understood to mean any kind of favour. In any event, SEIDOR refrains from acts not permitted by law, by the normal business practices or by the codes of ethics – if any – of the companies or organisations with which it maintains relations.

Gifts given by the company are characterised by the fact that they are intended to promote its brand image. Gifts offered – except if of modest value – must be managed and authorised in line with corporate protocols and a proper record kept of them.

SEIDOR's partners who receive unauthorised gifts or favours as provided for must report this to the company's Legal Compliance Committee, which will decide whether or not they are allowed to accept them.

3. Application

Reports

SEIDOR's employees, management and third parties related to it are required to report any breach or suspected breach of the Code of Ethics, the PTCC and/or any regulations intended to prevent a crime from being committed through the reporting channel put in place by the company.

Reports must be submitted through the online application posted by the company on its website.

In all cases, SEIDOR undertakes to keep the identity of informants confidential, notwithstanding any legal obligations in force, and the defence of the company's rights or those of individuals who must give evidence.