

GEOCISA

ANTICORRUPTION POLICY

INDEX

1. OBJECT	3
2. SCOPE	3
3. COMPLIANCE BODY	3
4. ACTION PRINCIPLES	4
4.1 Presents, Gifts, Tokens and Favours.....	4
4.2 Payments for enablement.....	5
4.3 Charitable Donations and Sponsorships.....	5
4.4 Contributions to Political Parties, Groups or Political Associations.....	6
4.5 Intermediaries, agents, advisors and business partners	6
4.6 Books and Records	6
5. TRAINING	7
6. WHISTLEBLOWING AND CONSULTATIONS.....	7
7. BREACH.....	7
8. REVIEW	7

1. OBJECT

Geotecnia y Cimientos, S.A., its branch offices and its subsidiaries (jointly, “Geocisa” or the “Company”) have maintained a business commitment throughout their history with the various agents interacting with the Company and its employees, based on ethical principles guiding Geocisa’s operation, as part of its corporate culture.

Adhesion to these business quality standards is confirmed in the Dragados Code of Conduct, which Geocisa has subscribed and is applicable thereto. Geocisa forbids any kinds of bribery to authorities, public officers, executives and employees belonging to public or private companies or bodies, in Spain or abroad, or any third party with which the company holds any kind of relationship.

Pursuant to such commitment, this Anticorruption Policy has been adopted, which implements what is foreseen in the Dragados Code of Conduct, in order to establish a regulatory framework and basic rules to prevent and detect any corruption and bribery in the Company’s operations, encouraging full compliance by Geocisa of regulations to fight corruption and bribery.

2. SCOPE

This policy applies to all directors, executives and employees of the Company, irrespective of their area of activity or hierarchical level, whether assigned to works, berthing, factories, central offices or services.

Furthermore, it will apply to those persons acting within and before other entities for and on behalf of the Company, who in such case, within their competences, will promote the application of its principles.

3. COMPLIANCE BODY

Geocisa’s Compliance Body is Dragados’s Compliance Committee, incorporated as an associate body in charge of surveillance and ensuring compliance with the Code of Conduct; it consists of the General Secretary, Head of Resources, Head of Legal Services and Head of Internal Auditing.

The Compliance Committee has independent powers of initiative and control to prevent the commission of offences, and will be assigned appropriate human, economic and material resources to design, develop, implement, evaluate, maintain and improve the Criminal Compliance and Antibribery Management System, and its performance results, as part of this Anticorruption Policy.

4. ACTION PRINCIPLES

Geocisa has adopted this Anticorruption Policy in order to establish a zero tolerance standard with respect to any form of corruption and bribery.

In order to prevent corruption and bribery, Geocisa will carry out all its activities in accordance with current law in anticorruption and antibribery matters, in all its fields of action and in all those countries where it operates, in line with its spirit and purpose. In general terms, Geocisa expressly and strictly forbids the following conducts:

- To make promises or offers of any type of payment to authorities, public officers, executives or employees belonging to companies or public or private authorities, in Spain or abroad, whether directly or indirectly, through agents, intermediaries, advisors or any other straw parties.
- To obtain undue advantages as a result of taking advantage of personal relations with authorities or public officers, or any other private party.

Geocisa demands that all decisions adopted any of its employees holding any type of relationship with the public administration, in Spain or abroad, be taken in strict compliance with the law, the Code of Conduct and the Company's internal regulations.

4.1 Presents, Gifts, Tokens and Favours

Geocisa's employees are forbidden from giving or accepting presents, gifts, tokens or favours when carrying out their activity; as an exception, gifts and presents may be delivered or accepted as long as they are not forbidden by law, are a result of commercial practices or ordinary and customary, generally accepted, signs of courtesy and, in any case, are of symbolic or immaterial economic value.

In any case, the provisions will be followed established in the Policy on Presents, Gifts, Tokens and Favours.

4.2 Payments for enablement

Payments for enablement will refer to minor, illegal and unofficial payments made to public officers or employees in a private company, seeking that these people speed up or enable the performance of their responsibilities, such as access to public services, the procurement of ordinary licences or business permits, administrative steps (e.g. telephone, electricity or water services), the provision of police protection or the loading and/or downloading of goods, amongst others.

All payments for enablement are strictly forbidden by virtue of this Policy.

Any activity that could lead to a payment for enablement, or which could indicate such potential payment, by or on behalf of the Company will be avoided.

4.3 Charitable Donations and Sponsorships

All Donations and Sponsorships must meet the following requirements:

- To be permitted by law.
- To not hide illegal payments to Public Officers, the Administration, an authority or public/private company, or any third party, whether Spanish or foreign, in breach of anticorruption regulations.
- To not constitute a channel with which to finance illegal activities in breach of legislation on the prevention of money laundering and the financing of terrorism, or any other applicable law or regulations.
- To be duly documented.

Furthermore, in addition to the foregoing, it will be necessary for all partners bound by a sponsorship agreement to be known, trustworthy, and enjoy a solid reputation.

In those cases where there is an interest in sponsoring any event, or arranging a stand at fairs and conferences related to the sector, the competent Manager will duly inform the General Manager in charge that such acts are being prepared and carried out, once authorised by the Sole Director.

Any type of donation must be previously and expressly authorised by the Sole Director, and will be made in favour of charitable organisations, which are trustworthy and enjoy

a solid reputation, in any case following the criteria foreseen in Geocisa's Policy on Presents, Gifts, Tokens and Favours.

4.4 Contributions to Political Parties, Groups or Political Associations

Any contributions made for political purposes are strictly forbidden by virtue of the provisions of this Policy.

4.5 Intermediaries, agents, advisors and business partners

The hiring of agents, advisors, intermediaries and agreements with business partners in operations or transactions howsoever involving an Administration, authority or public/private company, whether Spanish or foreign, will follow the highest standards of due care.

Consequently, to the extent possible, top-notch and prestigious companies will be used as business agents, advisors, intermediaries or business partners.

Devices to apply due care will be in place to ensure the most thorough awareness possible of any persons participating as agents, advisors, intermediaries or business partners and their collaborators, in such a way as to hire the ones that are most suitable for the activity in question, carried out in an ethical manner, without resulting in any economic damage or reputational risk for Geocisa or the Dragados Group.

All agents, advisors, intermediaries or business partners will be informed of any prohibitions that Geocisa has in place in corruption matters, and this will be duly documented; the foregoing must declare to be aware of such prohibitions and undertake to strictly abide by the same. These prohibitions will also be expressly and exhaustively included in any contracts signed with agents, advisors or intermediaries.

4.6 Books and Records

Geocisa will accurately reflect in its books and records, in a transparent, complete and adequate manner, all of the Company's actions, operations and transactions.

5. TRAINING

Geocisa will ensure that all of the Company's staff is duly trained to understand its ethical principles, as well as the duties and action principles derived from the Dragados Code of Conduct and its Anticorruption Policy.

6. WHISTLEBLOWING AND CONSULTATIONS

Any employee or third party who becomes aware of, or reasonably suspects, a breach of this Policy, must duly inform his/her hierarchical superior or report it through the Ethical Channel, canaletico@dragados.com.

This channel acts both as a whistleblowing device for any breach of the rules contained in this Policy, and as a means to resolve any doubts that may arise from its application.

Geocisa guarantees that no retaliation whatsoever will be brought against any whistleblowers acting in good faith, as provided herein.

7. BREACH

A breach of the provisions of this Policy and applicable law may entail serious consequences for the Company, its employees and executives.

This Policy is a mandatory rule, which is why its non-compliance will constitute a breach thereof and the Company will adopt any disciplinary measures that are appropriate, according to employment legislation and the Sanctioning Regime contained in the applicable Collective Bargaining Agreement, without prejudice to any other liability that the offender may have incurred. Likewise, Geocisa reserves the right to adopt any measures deemed appropriate against any business partners that fail to comply with the same.

8. REVIEW

The Compliance Body will periodically review the content of this Policy, ensuring that it gathers recommendations and best international practices in force at all times, and will

propose any amendments and updates to the Management Body in order to promote its implementation and continuous improvement.

Approved by the Sole Director on 15 March 2019