

Annex to System Manual

REFERENCE

TITLE Policy of the *Criminal Compliance System*


PROCESS Compliance

EDITION 00

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00	11/08/2020	Definition of the policy of the Criminal Compliance system	CO	DG

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1. OBJECT OF THE POLICY

The **Criminal Compliance** Policy, which develops the Code of Ethics and Conduct of **Montajes ROTELU s.l.** is integrated into ROTELU's Integrated Management System and its purpose is to define the general principles that inform said system, as well as the main commitments that are assumed by the organization in terms of compliance and that should guide its behavior in all its areas of performance and in the achievement of its business objectives. **It is a text aligned with its determination not to tolerate any conduct that may constitute a crime within it.**

2. AREA OF APPLICATION

This Policy is applicable globally to the Members of the Organization, but it is also extended to other interested parties, including business partners, suppliers, subcontractors, service providers, intermediaries, among others, provided that the specific circumstances of the case so advise, complying with the due diligence processes of the Organization in its selection of Third Parties to guarantee compliance with the criminal law, which establishes the obligation of **Montajes ROTELU s.l.** to monitor the conduct carried out by those who, being subject to the authority of the legal representatives and administrators of fact or law of the legal entity, have been able to engage in criminal conduct due to having seriously breached the duties of supervision, surveillance and control over them, given the specific circumstances of the case, regardless of whether they are Members of the Organization or Business Partners, suppliers or other interested parties.


3. OBJECTIVES OF COMPLIANCE

The main objectives of **Montajes ROTELU s.l.** in matters of **Criminal Compliance** are:

- a) promote a culture of compliance and zero tolerance for regulatory breaches.
- b) ensure, through prevention, detection, supervision, training and response activities, compliance of the organization in all its activities and operations with all applicable regulations, both external regulations and the internal regulatory system, thus avoiding possible penalties, economic losses and reputational damage.

4. COMMITMENTS

The organization **Montajes ROTELU s.l.** Manifests zero tolerance regarding conduct that may entail non-compliance with criminal regulations and unethical conduct.

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ROTELU guarantees, in front of the competent judicial bodies, that it carries out an effective fulfillment of the duties of supervision, surveillance and control of its activity, establishing measures to prevent or significantly reduce the probability of commission of criminal offenses included in the scope of the Article 31 bis of the Spanish Penal Code.

On this basis, **ROTELU's** main commitments regarding compliance are configured, which are:

1. Promote knowledge and respect of the Applicable Regulations, both external and internal, generating a culture of compliance and "**zero tolerance**" for non-compliance with said Regulations, with the unequivocal support, commitment and leadership of the administration and senior management of **ROTELU**.
2. Communicate and educate managers, employees and counterparts of the obligation of information and reporting of behaviors that do not respond to **ROTELU's** standards of good practices and compliance, enabling for this purpose an adequate communication channel that guarantees their independence, as well as confidentiality and absence of retaliation for the complainant and the rights of the investigated persons.
3. Ensure the existence and compliance of a disciplinary system that punishes conduct contrary to the Applicable Regulations, ensuring its equitable, proportional and fair application.
4. Develop a **Criminal Compliance** management system that allows identifying, evaluating and managing the risks of non-compliance that may occur in **ROTELU's** activities, operations, products and services, as well as identifying controls and integrating them into the organization's processes, through policies internal, management rules and action procedures.
5. Provide training and advice to all staff in matters related to compliance, as well as, where appropriate, to third parties that are related to **ROTELU**.
6. Periodically evaluate the design and performance of the **Criminal Compliance** management system, implementing whatever changes and opportunities for improvement are identified.
7. Ensure and maintain the independence of the **Criminal Compliance** function within the organization.

5. ROLES AND RESPONSIBILITIES

The Administrative Body, or sole administrator, is responsible, among others, for the implementation and monitoring of the company's internal control systems, as well as for supervising their effectiveness.

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The Compliance Body, or ***Criminal Compliance Officer***, is responsible for ensuring compliance with the commitments established in this Policy, developing ***Criminal Compliance*** and supervising the validity of its controls.

6. APPROVAL

The management body of **Montajes ROTELU s.l.**, in the exercise of the functions assigned to it, and as a sign of its commitment to the **ROTELU Criminal Compliance** management system and to the creation, promotion and continuous development of a culture of compliance in within the organization, it proceeds to approve this ***Criminal Compliance*** Policy, with the instruction that it be made available to all managers, employees and, where appropriate, to the Counterparties that are related to **ROTELU**.

The General Director