

◆ ETHICS, INTEGRITY AND COMPLIANCE

SUMMARY

Code of Conduct & Compliance Manual

A summary of Tecnococonsult Group's Code of Conduct & Compliance Manual, for clients, partners and suppliers.

APPLIES TO ALL OUR OPERATIONS

FCPA & UK BRIBERY ACT

COMPLIANCE COMMITTEE OVERSIGHT



OUR FRAMEWORK

“Tecnconsult has focused its efforts on the design, development and safeguarding of its most valuable asset: its good reputation.”

Carlos E. Yanes Alegrett
CHIEF EXECUTIVE OFFICER

◆ OUR FRAMEWORK

Ethics is how we conduct business

The Corporate Code of Conduct states our mission and vision, our core values, guiding principles and fundamental commitments. It is supplemented by the Compliance Manual, which gives guidance on protecting our people and work environment, our assets and information, our business and brand and, finally, our reputation.

Tecnconsult’s Ethics and Compliance program is designed to promote an organizational esprit de corps that encourages ethical conduct, good-faith escalations and adherence to all applicable laws, rules and regulations in the countries where we operate.

The program is aligned with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, and with internationally recognized best practices in corporate governance, ethics and anti-corruption.

FCPA ALIGNED

UK BRIBERY ACT

COMPLIANCE COMMITTEE

YEARLY ATTESTATION

Who it applies to

All members of the international Tecnconsult Community: directors, executives, managers and employees, as well as those who represent or act on behalf of Tecnconsult, including hired personnel, contractors and subcontractors. The Community re-affirms its commitment by attesting to the Code and the Manual on a yearly basis.

◆ MISSION AND VISION

A high-value engineering center with global reach

We are a high-value and competitive engineering center with global reach, that operates with high ethical and technical standards.

MISSION

Provide value and quality services in engineering, procurement and construction management in a safe, profitable manner, with social and environmental responsibility, in order to satisfy our client's and shareholder's expectations, and contribute to the well-being of our collaborators, based on our technical and managerial experience, as well as our principles and values.

VISION

To be a recognized engineering company for our local markets, as well as a preferred, competitive and reliable high value engineering service (HVE) for other engineering and construction companies in international markets.

◆ OUR CORE VALUES



Excellence

Continuous search for excellence and delivery of value.

Based on our spirit of continuous improvement, the search for excellence never ends — offering high quality services and creating value for customers, associates, employees and shareholders.



Ethics

Adherence to ethical standards and legal regulations.

Integrity, loyalty, honesty and respect are the foundations expected in our relationships with employees, customers, contractors, suppliers and associates. Our open-door culture supports good-faith escalations. Always doing the right thing is an unbreakable rule.

Four principles that hold in every jurisdiction



Equality

Employer with equal opportunities and fair employment practices.

Equal employment opportunities, without discrimination of any kind, based exclusively on merit and individual values, ensuring a diverse and inclusive workforce within a framework of fair employment practices.



Respect

Respectful, safe and quality work environment.

Tolerance is promoted; harassment, humiliation and intimidation are not permitted. We encourage good faith reporting of potential violations of the Code and the Manual.



Transparency

Transparent long-term relationships.

Relationships of transparency, respect and integrity with customers, suppliers and associates. Our Bid / No Bid Committee considers relevant risks, resources and relationships before taking on new clients or opportunities.



Prosperity

Integral development and compensation.

The generation of prosperity, integral development and compensation for shareholders, employees, contractors and suppliers, as just compensation for their trust, contributions and efforts.

◆ OUR COMMITMENTS



Clients

Customer satisfaction leads our priority list. We cultivate a spirit of continuous service and support, with the aim of creating value for our clients and associates.



Our talent

Our most appreciated asset is our high-level talent and its solid experience. We are committed to their wellbeing, progress and development.



Safety, Health and Environment

We are unequivocally committed to the principles of safety, hygiene and health of our employees and contractors, as well as a culture of environmental responsibility.

Protecting people and the work environment

Fair treatment, courtesy and respect are owed to every member of the Tecnoconsult Community – in an office, at home, on a job site or at a client site.



Behavior at Work

Tecnoconsult prohibits the intentional and unintentional harassment of any individual on the basis of any protected classification. Harassment is unwelcome verbal, visual or physical conduct that creates an intimidating, offensive or hostile work environment, or that degrades or shows hostility toward a member of our Community.



Fair and Equal Opportunity Employment

We do not discriminate on the basis of race, creed, color, ideology, religion, national origin, ancestry, citizenship status, age, physical or mental disability, medical condition, sex, gender, gender identity, pregnancy, childbirth, marital status, veteran status, sexual orientation, genetic information, or any other characteristic protected where we operate. Reasonable accommodations are made for disclosed disabilities, and no form of retaliation is allowed.



Health, Safety and the Working Environment

Tecnoconsult provides healthy and safe working conditions. Employees, subcontractors and other third parties involved in our activities must meet applicable local and international health and safety requirements. We aim to continuously reduce risks of occupational accidents and illnesses.



Human Rights

We conduct our global operations consistent with the spirit and intent of the United Nations Declaration of Human Rights and the U.K. Modern Slavery Act. There shall be no forced labor, including bonded or voluntary prison labor, and we do not use child labor within our business model or practices.

Protecting assets and information

Our know-how, our records and the personal data entrusted to us are assets to be defended with the same discipline we apply to engineering.



Protection of Intellectual Property

Our confidential information, creative know-how, technology and means of execution — reflected in patents, copyrights, trademarks and trade secrets — differentiate us in the marketplace. The Community has the duty to protect our Intellectual Property and not to infringe upon the Intellectual Property of others.



Accurate Books and Records

To comply with Anti-Corruption Laws, we maintain detailed books, records and accounts that accurately and fairly reflect our transactions. All transactions are recorded accurately, transparently and in a timely manner, described in sufficient detail and supported by documentation that is retained and accessible.



Information and Cyber Security

Our efforts preserve the confidentiality, integrity and availability of information and reduce the risk and impact of potential threats to business operations. It is our expectation that all members of the Community abide by security measures to mitigate security risks.



Privacy and Personal Data

Personal data of employees, contractors, directors, shareholders, customers and anyone else we do business with is protected through appropriate security and access measures. It may not be used or disclosed improperly, or used by someone not authorized to do so.



Insider Trading and Stock Tipping

Trading on material nonpublic information, and providing a tip to someone who then buys or sells securities, is prohibited and illegal. Penalties include termination and may include civil and criminal liability.

“Protecting Tecnoconsult’s confidential information and intellectual property is crucial to preserving our business and our competitiveness.”

COMPLIANCE MANUAL · PROTECTING ASSETS AND INFORMATION

Protecting business and brand

Zero tolerance for corruption is not a slogan: it is a set of rules that decides which work we take and how we execute it.



Anti-Corruption

We comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, and other laws prohibiting public or commercial bribery, extortion, kickbacks or other improper means of conducting business.



Gifts, Entertainment and Hospitality

Not permitted where they could be viewed as an inducement for any decision. Any gift must be reasonable, customary and proportionate, given openly, never in cash or cash equivalents, never part of a pattern, and documented. Anything provided to a Government Official requires advance approval from the General Manager or CFO.



Conflict of Interest

A conflict exists if a private interest interferes, or appears to interfere, with the interests of Tecnoconsult. Actual or apparent conflicts of interest must be disclosed in writing to supervisors.



Donations and Charitable Contributions

Before announcing, offering, promising or making a contribution we verify the organization's charitable status, identify any relationship with government officials, and confirm the donation will not be used for illegal purposes.



Money Laundering

We will not be involved, knowingly or unknowingly, in any money laundering scheme, and we exercise appropriate due diligence on subcontractors, suppliers and other vendors.



Export Controls and Trade Compliance

We observe customs laws and foreign policy-based trade controls, including economic sanctions and embargoes, as well as licensing requirements for the export or import of goods and services in every country where we operate.



Competition and Antitrust Laws

Agreements with competitors that might restrain trade are prohibited. Legal advice is sought before joining a trade association or exchanging information with or about customers and suppliers.



Quality Leadership

We are committed to quality leadership and the continual improvement of our processes and professional services. It is everyone's responsibility to improve quality using client feedback and performance measures.



Political Activity

No funds, facilities or services may be paid or furnished to any political party, candidate for or holder of public office, or referendum campaign. Personal political affiliations are respected, but may not use Tecnoconsult's resources, assets, reputation or corporate image.

Protecting our reputation

Reputation is a measure of trust. It is our stakeholders who decide what it should be — and it is tightly linked to the company's long-term sustainability.



Corporate Reputation

We strengthen our reputation on the basis of our overall performance, compliance with our ethical standards and values, the quality of our professional talent and the consistency of our corporate citizenship programs. Ensuring and continuously nurturing this trust is a vital management goal.



Internal Communications and Social Media

Use of Tecnoconsult's email and internet services is regulated by the Information Technology Management, and every member of the Community must know its Norms and Regulations for the Use of Internal Communications. Violation of these rules is considered serious.



Corporate Citizenship

Through the Tecnoconsult Foundation, in four areas: financial assistance to employees for their children's education and personal health matters; support for scientific and technological research in universities; assistance to education centers in underprivileged areas; and a donation program of used electronic equipment to public universities, schools and NGOs.



Environmental Responsibility

The company develops and strengthens awareness of environmental issues among its employees through internal communication programs and activities focused on reducing, reusing and recycling materials.

Good faith reporting

◆ THE COMPLIANCE MANUAL, IN FOUR PARTS

01
 People and the work environment

02
 Assets and information

03
 Business and brand

04
 Our reputation

Tecnoconsult encourages good faith reporting of a potential violation of any local or international laws, of this Code of Conduct and Compliance Manual, or of any of Tecnoconsult's policies and procedures. Retaliation, harassment, humiliation or intimidation of or against anyone who reports in good faith will not be tolerated.

CONFIDENTIAL REPORTING MAILBOX

confidencial.codigodeconducta@tecnoconsult.com

REPORTING CHANNELS

- ◆ Any Manager or Executive
- ◆ Human Resources
- ◆ A member of the Executive Committee
- ◆ A member of the Compliance Committee

This document is a summary of Tecnoconsult Group's Code of Conduct & Compliance Manual, prepared for clients, partners and suppliers. **The complete Manual prevails** and is available for review as part of any qualification or onboarding process. To request it, write to **tecnous@tecnoconsult.com**.

REMEMBER TECNOCONSULT'S SIMPLE AND UNBREAKABLE RULE

"Always do the right thing"