

Through the current Compliance and crimes prevention policy, our organization's permanent disposal (hereinafter Tecam) and exposition is reflected, being committed to the activities' development with the maximum level of ethics and compliance with the regulation in force.

The requirements in the field of the organization's penal responsibility derived from its business activity established by the regulations and laws in force have been taken into account as a starting point when developing the current Tecam Compliance Policy.

Having been developed in collaboration with the Compliance Responsible, the current Compliance Policy has been approved by the Government Body (Top Management) of Tecam.

The Government Body (Top Management) of Tecam prohibits any behavior or conduct that may involve the violation of the legislation in force. Thus, the organization has arranged the necessary resources so as to adequately implement a compliance and crimes prevention system on its business activity aiming at preventing, controlling and managing whatever possible risk related to a penalty crime commission the company, related parties, business partners or controlled societies could be exposed to.

SCOPE, RANGE & OBJECTIVES

The current Compliance and Crimes Prevention Policy applies to:

TECAM SOLUCIONES MEDIOAMBIENTALES,SL

Adress: C/ Tramuntana 13
08213 Polinyà (BCN)
Spain
Phone: +93 4281154
Email:
info@tecangroup.com

According to followed business activities:

- *Design, manufacture and technical assistance of equipment and units for steam and electricity, exhaust air treatment and liquid and solid waste incineration*

The scope is extended to all Tecam staff and entities defining its business group, as well as all that employed or subcontracted staff, linked agents, partners, collaborators, prescribers, or any other authorized physical or juridical person or acting on behalf of our organization.

All juridical and physical in the organization's application scope must develop their activity according to the legal dispositions in force.

When it comes to the compliance and crimes prevention system, Tecam has taken into account the accomplishment of the minimum requirements established at both UNE 19601:2017 and point 5 of section 5 of the article 31 bis of the Spanish Penalty Code. The disciplinary code to apply is based in the Statute of Workers (also the Applicable Collective Agreement).

The designed and implemented compliance and crimes prevention system, which is subject to periodic evaluations and revisions, has the main objectives:

- Reduce the exposition to penalty risks in our activities.
- Prevent conducts or behavior that violate the legislation in force or perceived as non-ethically acceptable by our groups of interest.
- Train and raise awareness of penalty risks whose people, professionals, directorate, shareholders, partners behaviors are exposed to as well as the adequate answer mechanisms established by our organization.

Thus, Tecam periodically identifies and evaluates the penalty risks its business activity is exposed to, supplying documentary evidence of the results in our **risks compliance matrix** and establishing control plans of all the evaluated risks considered “low risk” upwards so as to prevent and reduce its probability of occurrence, as well as to establish tracing and control mechanisms.

“EVERYBODY’S COMMITMENT”

Any employee, partner, shareholder, directorate, representor and/or authorized person or acting on behalf of our organization must inform and/or report whatever susceptible or suspicious, action, conduct, information or evidence of infringement on our organization’s Compliance & Business continuity policy and that may suppose a criminal action.

Tecam has ordered the following means so as to everybody being able to report whatever sort of incident or suspicious conduct:

- **Direct communication with Criminal Compliance Collective Body through email**
compliance@tecamgroup.com
- Communication register through Reporting Channel (confidential and optional anonymity) arranged by our organization in the company’s webpage:
<https://www.sofidya.com/tecamsolucionesmedioambientales/-compliance->

Tecam expresses its gratitude and positively appreciates the communication of whatever legality violation clue or suspicion of any employee, person or related organization connected to our company. For this reason, we appreciate to present the reported or communicated facts in more detail.

Our organization has made safety internal mechanisms/procedures available in order to guarantee the received communications/reports’ confidentiality as well as to protect these people participating in our accomplishment objective through reporting and communicating from any threat or coercion. Furthermore, it is guaranteed that the employee will not suffer reprisals from the company for reporting on suspicious facts or conducts related to criminal risks.

In order to guarantee the maximum Independence, our organization has designed a specific job position in our organization chart, namely **Compliance Officer**. In our company is a **Collective Body** with internal personnel and with a representative of it. Directly depending on the Administration board, this position gives adequate capacity, independence, and authority to ensure the correct implementation and improvement of our compliance and crime prevention system according to the defined and agreed requirements. The appointed Criminal Compliance Collective Body is available to all members of the organization to advise, guide and support with respect to ethical actions and compliance. Equally, our organization will proportionately make all needed resources available in order to carry out the actions, measures, and controls planned in our **Risks’ Control Plan**.

The company has the support of an external consultancy specialized in criminal compliance for assessment and management in necessary case.

As a result of the internal and external efficiency evaluation mechanisms of our compliance and crime prevention system as well as based on the information collected, analyzed and evaluated, some mechanisms have been established to constantly improve the efficacy of our compliance and crime prevention system, aiming at creating an authentic “live being system” capable of adapting to the changing market circumstances and to the improvements, opportunities and failures detected.

The Government Body (Top Management)/ Bernat Sala (CEO)

Polinya, September 20th ,2022

A handwritten signature in blue ink, appearing to be 'Bernat Sala', written in a cursive style.