

ANTICORRUPTION POLICY

1- Objective

Through this policy, TOLSA expresses its commitment to comply with the Global Pact, according to which "*companies undertake to fight corruption in all its forms, including extortion and bribery.*"

2- Scope

This policy is applicable to all TOLSA personnel, whatever their hierarchical level, suppliers and subcontractors.

Considering the activities most exposed to the risk of corruption, TOLSA regulates the following activities:

1. Bribes

The use of any form of illicit payment, with pecuniary means or of any other kind (anything that supposes an advantage for a person, of material or moral, financial or non-financial value and that is considered relevant according to the uses and customs) is prohibited with the aim of obtaining any advantage in relations with the other party.

The prohibition also applies to collaborating entities that, by virtue of their functions and the activities they carry out, intend to accept or offer bribes for their own benefit, that of family members, associates or acquaintances.

If any collaborator becomes aware that bribes have been agreed, offered or requested, they will be obliged to inform the Company's Management.

2. Gifts and favours

TOLSA does not deliver or accept any type of gift that may be interpreted as something that exceeds normal business practices, courtesy, or that is intended by the person who gives it to receive a favour through the performance of any activity by TOLSA.



Any form of gift that could influence the independence of judgment or lead to the granting of any type of favour is prohibited. This includes free participation or invitations, job promises and/or gifts exchanged with suppliers.

TOLSA's gifts will be characterized by their purpose to promote the brand image or because they will offer a clear common benefit of business interest. All gifts offered must be managed by the Director or Head of Department and must be authorized by the General Management.

People who receive gifts must give them to the company to be raffled among TOLSA staff at the end of the year.

3. Donations to political parties

TOLSA refrains from participating in or sponsoring any event whose purpose is political propaganda; illicit pressure directly or indirectly from political parties, representatives or candidates is not allowed, nor is the acceptance of economic benefits or personal influence in government spheres or connections with those who exercise authority in order to obtain favours or benefits.

4. Favour deals

TOLSA does not authorize the making, offering or direct or indirect acceptance of payments or benefits for any activity to streamline services, processes or any additional advantage to those established.

TOLSA's purchase and sale procedures are carried out correctly and transparently in accordance with the anti-corruption policy, ensuring the proper management of offers, selection of suppliers, and corresponding contracts.

Any TOLSA employee who suspects that they are the protagonist of a conflict of interest has the moral obligation to report the situation to the company. Not reporting the event will be assumed as conduct that violates the anti-corruption policy and consequently will generate sanctions according to the seriousness of the conflict or event.



5. Code of ethics

Personnel hired directly by TOLSA, and subcontractors must, at all times, submit to the Company's Code of Ethics, which includes the commitment and ethical responsibility of the Company and its employees, whose activities are governed by criteria of honesty and professionalism in their activity in the company, avoiding at all times any conflict in the personal and work spheres and demanding the same standard of conduct towards the companies or individuals with whom we deal.

Javier Pau
General Manager
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