

SEPTEMBER 2021

CRIMINAL RISK PREVENTION POLICY

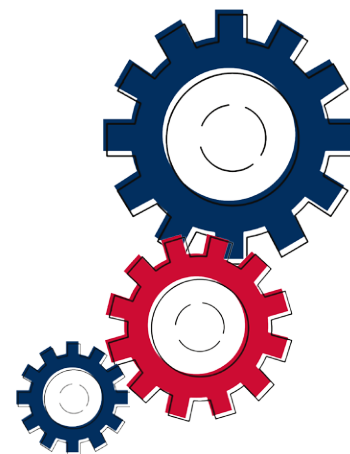


Scope of application

The Criminal Risk Prevention Policy applies to all members of IDE Electric.

"Members" are considered to be anyone forming part of the Board of Governors; the General Management; the Heads of Department, the personnel who offer their services on behalf of IDE, regardless of the mode or duration on their contract; advisors; lawyers, and consultants.

IDE will promote the application of that laid out in this Policy, where applicable, to their customers; suppliers; service providers and other third parties which whom they have relations in the exercise of their activity.



Commitment of the board of governors

The Board of Governors is responsible, among other things, for formulating the strategy and approving the Criminal Risk Prevention Policy of the company, and for organising the internal management systems with the aim of maintaining strict control of the compliance with the applicable legislation, the ethical principles and internal regulations.

With this Policy, the Board of Governors demonstrates the firm commitment of the company and of all its members to:

Know and strictly comply with the applicable legislation relating to the development of the company activity, and to respect in full the obligations and commitments assumed in their contractual relations with third parties.

Provide all the necessary means and resources to promote, where applicable, the prevention, control, detection and sanction of the illegal or unethical acts and behaviour that may take place within the company.

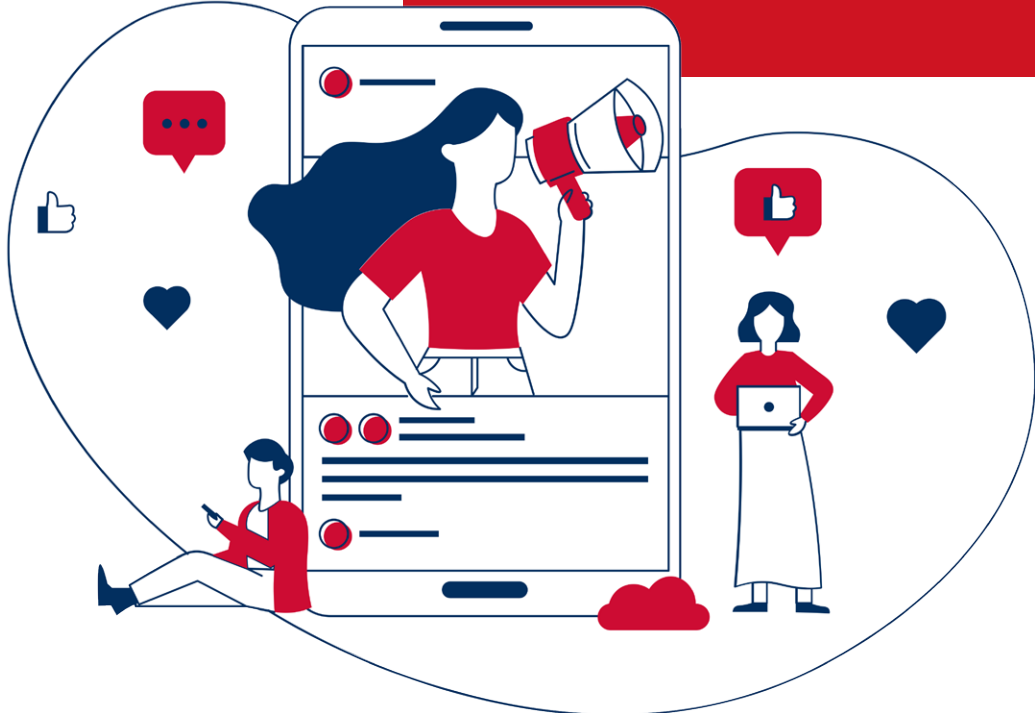
Observe the general principles for the prevention of crime listed in the Manual of the Criminal Risk Management System and compliance with the Code of Conduct; and with the other internal legislation and risk controls established

To maintain honest and unabridged attitude in all their activities and, therefore, be opposed to any form of illegal act, criminal or of any other nature.

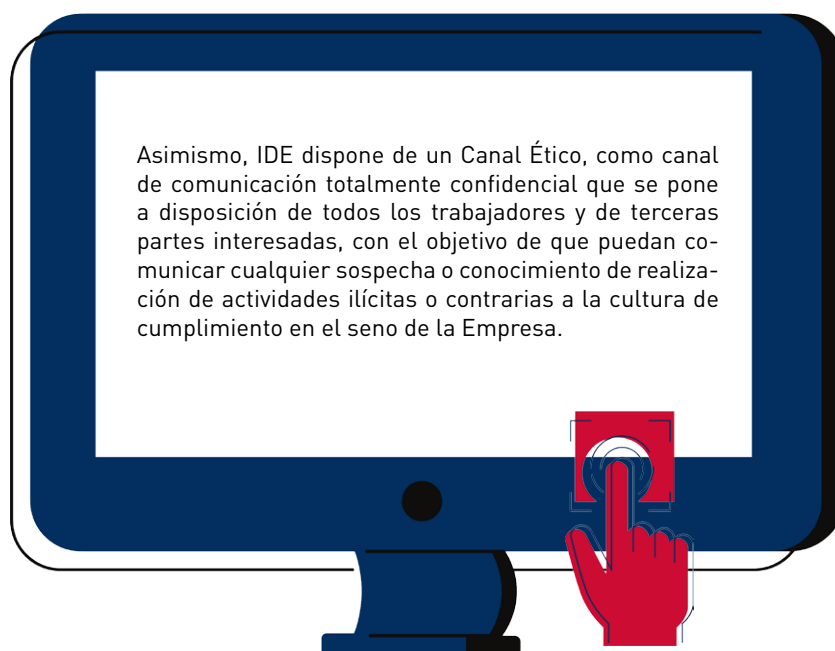
Avoid any form of corruption by observing the particular needs and circumstances of all the subjects involved in the business and professional activities of the company

This commitment to zero tolerance and opposition to the committing of any class of illegal act, and to maintaining a company culture of honesty, integrity and ethics is promoted by the Board of Governors and by the General Management of IDE, and must be fulfilled by all members of the company and their interested parties.

Consequently, strict compliance with the law, with this Policy, the Code of Conduct, and the other internal regulations of the Integrated Management System and the Criminal Risk Management System (hereinafter, SGRP or Compliance), is obligatory for all members of IDE; such that the relevant disciplinary measures will be adopted, case by case, to sanction any breach to this effect.



Como muestra de este firme compromiso, IDE ha configurado un Sistema de Compliance y nombrando un Comité de Cumplimiento, con poderes autónomos de iniciativa y control, encargado del desarrollo, supervisión y seguimiento del Sistema de Gestión de Compliance; habiendo sido dotado con los recursos, independencia y autoridad necesarios para el desarrollo de sus funciones.



Asimismo, IDE dispone de un Canal Ético, como canal de comunicación totalmente confidencial que se pone a disposición de todos los trabajadores y de terceras partes interesadas, con el objetivo de que puedan comunicar cualquier sospecha o conocimiento de realización de actividades ilícitas o contrarias a la cultura de cumplimiento en el seno de la Empresa.

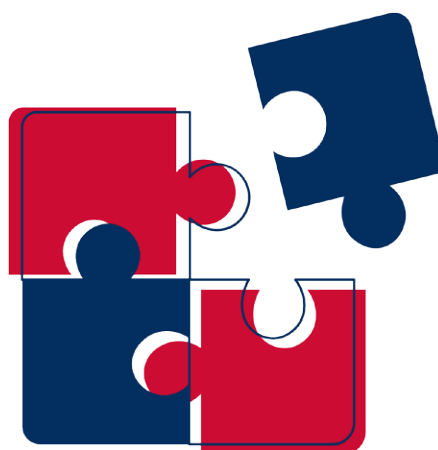
Aprobación, vigencia y revisión

Esta Política de Prevención de Riesgos Penales ha sido aprobada por el Órgano de Administración y tiene una duración indefinida.

El Comité de Cumplimiento, contando en su caso con el Departamento de Calidad en cuanto a la gestión integrada de los sistemas de gestión, revisará periódicamente la presente Política de Prevención de Riesgos Penales y propondrá al Órgano de Administración las modificaciones y actualizaciones que contribuyan a su desarrollo y mejora continua, atendiendo, en su caso, a las sugerencias y propuestas que realicen los miembros de IDE u otras partes interesadas.

Órgano de Administración

IDE Electric, SL





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