



## **Global omnium anti-corruption policy**

# **GLOBAL OMNIUM ANTI-CORRUPTION POLICY**

## **1. OBJECTIVE AND SCOPE**

GLOBAL OMNIUM is a business group whose main activity is the management of the Integrated Water Cycle. The integral water cycle is the journey taken by water from when it is collected in its raw state in Nature, until its purified availability and, closing in the opposite direction, the journey taken by the water to be returned suitably purified to Nature.

In this sense, GLOBAL OMNIUM focuses on the following activities: supply of drinking water to populations, sewage, reading process, billing and collection, sanitation, evacuation and purification of wastewater, implementation, maintenance and conservation of works and constructions for the compliance with its corporate purpose, laboratory analysis, solid waste management, irrigation and water supply for agricultural uses

The nature of the company and its activities expose GLOBAL OMNIUM to various risks, among others, ethical risks in the field of corruption and influence peddling, risks that, if materialized, would imply criminal liability for the company and its users. responsible for such acts (see **Annex 1**. Expressly prohibited conduct).

Esta Política se aplica a las actividades realizadas por GLOBAL OMNIUM y sociedades dependientes, y debe ser asumida e implementada igualmente por aquellas organizaciones que actuen en nombre o por cuenta de GLOBAL OMNIUM.

This Policy applies to the activities carried out by GLOBAL OMNIUM and dependent companies, and must also be assumed and implemented by those organizations that act in the name or on behalf of GLOBAL OMNIUM.

## **2. BANS**

GLOBAL OMNIUM is a responsible company, promoter of an ethical culture and respect for standards, and committed to the active prevention of illicit conduct. As a consequence, it facilitates and promotes compliance with the rules applicable to the organization, and expressly prohibits any conduct that may fall within any of those listed in Annex 1 (expressly prohibited conduct).

Likewise, GLOBAL OMNIUM prohibits its members from using personal or third-party funds for any activity prohibited by this Policy.

## **3. PREVENTIVE COMMITMENT OF GLOBAL OMNIUM**

GLOBAL OMNIUM actively prevents and monitors the risk of manifestation of the conduct included in the Annex to this document, which is strictly prohibited.

To facilitate the materialization of this commitment, GLOBAL OMNIUM has established a crime prevention management system that:

- a) Includes the organization's commitment to the active prevention of crimes, through a Crime Prevention Policy.
- b) Includes a series of activities aimed at ensuring adequate and reasonable preventive management, oriented to risk.

- c) Specify objectives regarding the above and measure their level of achievement.
- d) It helps to detect and react diligently to any non-compliance that may occur to avoid or minimize its negative consequences for third parties and for the organization itself, including a reporting mechanism that guarantees confidentiality and the absence of retaliation.
- e) It is reviewed to ensure its continuous improvement.
- f) Defines the functions and responsibilities of the different bodies and groups of the organization in relation to crime prevention, including new roles expressly dedicated to crime prevention.

#### **4. GUIDELINES**

GLOBAL OMNIUM's actions must be conceived at all times under the principle of respect for the law, as well as the principles and guidelines of business behavior that the company subscribes to.

The members of GLOBAL OMNIUM, as well as those personnel who act in the name or on behalf of GLOBAL OMNIUM, must act with education, professionalism and objectivity, considering at all times the interests of the company and the non-contravention of internal regulations and legality. applicable.

##### **4.1 Samples of hospitality, courtesy and other attention**

Gifts, hospitality and hospitality include any product, service, hospitality or other benefit, including meals, drinks, travel, hotels, entertainment and leisure (tickets, passes, etc.), tips, commercial hospitality, training, , transportation, commissions, fees, salaries, payments, preferential prices, gift vouchers, titles, affiliations, discounts, and any other similar product, service or benefit, including those intended to recognize the closing of an agreement.

These attentions should never be offered or accepted as a means to influence a person's business or professional decision.

To facilitate the application of this Policy, the following guidelines are established in relation to displays of hospitality, courtesy and other attention:

1. The performance or acceptance of commercial hospitality will only be permitted when it is appropriate, reasonable and for operational, promotional or mere courtesy purposes, offered or accepted in the ordinary, foreseeable and unforced course of a commercial or institutional situation.
  - The delivery or acceptance of gifts of an institutional or open nature, intended for a group of people for advertising, professional or commercial reasons, is permitted. Other alternatives will require the authorization of the CEO and inform the Compliance Manager in accordance with what is indicated in Annex 2 (information form for an act of hospitality, courtesy or other special attention).
  - The offer or acceptance of lunches is permitted, as long as they coincide with a legitimate business or work meeting, and as long as they are specific and infrequent cases, of a reasonable value for commercial and social uses, and that cannot be interpreted as a form of undue influence. Other alternatives will require the authorization of the CEO and inform the Compliance Manager in accordance with what is indicated in Annex 2 (information form for an act of hospitality, courtesy or other special attention).

It is permitted to accept or offer payment for travel and accommodation, under authorization of the CEO and informing the person responsible for Compliance in accordance with what is indicated in Annex 2 (information form for an act of hospitality, courtesy or other special attention). ), when the presence of the invited person is necessary for legitimate business actions, as exhibitors and/or attendees at organized sector events, exclusively within the period of the event in question, without including third parties, in hotels with a maximum of 4 stars and economy class flights, and provided that it cannot be construed as a form of undue influence.

- It is permitted to carry out or accept free training activities that are short or of little economic relevance for business reasons, under authorization of the CEO and informing the Compliance Manager in accordance with what is indicated in Annex 2 (information form for an act of hospitality). , courtesy or other special attention), with the aim of reinforcing the guest's knowledge of specialized sectoral topics. If travel and accommodation are required, the provisions indicated in the previous point will be followed.

- It is only permitted to accept or offer leisure and entertainment activities free of charge, in the case of invitations that do not exceed the limits considered reasonable in habitual, social and courtesy uses, and that due to their cost, frequency, characteristics or circumstances could be objectively interpreted as facts without the intention of affecting the impartial judgment of the recipient, and in any case, always under the general conditions established by the corporate policy on this matter. Specific procedures will be established to regulate this type of care in accordance with the purpose and principles of this Policy.

1. Accepting or offering gifts in cash or cash equivalent is not permitted.

2. The above commercial attentions are prohibited when carried out indirectly, that is, through a third party or with personal funds, to circumvent the guidelines of this Policy.

#### **4.2 Purchasing and contracting processes**

Purchasing and contracting processes can be used fraudulently to commit some of the conduct prohibited by this Policy, contrary to contracting regulations.

The selection process of our suppliers will fundamentally address objective criteria such as quality and cost, as well as the level of integrity, reputation and alignment of the supplier with the principles and behavioral guidelines included in the Global Omnium Code of Ethics.

Global Omnium will ensure transparency in all supplier bidding, selection and contracting processes, which must be carried out in accordance with internal rules and procedures. Global Omnium members will always adopt impartial behavior, ensuring that contracts are only awarded to those suppliers that have been best positioned compared to other bidders.

Under no circumstances will we propose, accept or participate in any corrupt practice that may take place during the process of purchasing or contracting products or services. For these purposes, the provisions established in section 5.5 of the Global Omnium Code of Ethics (“Prevention and rejection of corruption”) as well as in section 4.1 of this Policy (“Exhibitions of hospitality, courtesy and other attentions”) will apply.

Under no circumstances will we propose, accept or participate in any corrupt practice that may take place during the process of purchasing or contracting products or services. For these purposes, the provisions established in section 5.5 of the Global Omnium Code of Ethics will apply.

("Prevention and rejection of corruption") as well as in section 4.1 of this Policy ("Exhibits of hospitality, courtesy and other attention")

#### **4.3 Offer submission processes for tenders and contract renewals.**

In the processes of submitting bids for tenders, or in the renewal of contracts already awarded, the behavior of those involved must be especially prudent and rigorous in relation to this Policy.

The Global Omnium people involved in the preparation and presentation of offers will always observe compliance with current regulations and, in particular, the regulations applicable to public sector contracts, regulations against fraud and corruption, as well as such as the group's Code of Ethics and the guidelines in relation to displays of hospitality, courtesy and other attention established by this Anti-Corruption Policy.

To facilitate the application of this Policy, the following specific guidelines are established in relation to the bid submission processes:

1. The rules or specifications of public tenders will not be illegally influenced.
2. Nothing of value will be offered, promised or paid to any person who is in a position to directly or indirectly influence the rules or specifications of public tenders, or the decision thereof.
3. All members belonging to groups that are formed for the preparation of offers will sign a declaration of commitment to this Annex 3 Policy (declaration of commitment to the Anti-Corruption Policy by those involved in an offer process), which will be managed the Compliance Officer.
4. Each business area must specify this policy in specific procedures adjusted to its commercial reality in which, in view of the characteristics of the business, the decision-making sequence will be defined.

#### **5. WAY OF ACTING IN THE FACE OF CONFLICTS OF INTEREST AND RISK SITUATIONS**

When a member of GLOBAL OMNIUM considers that he or she may be the subject of a request for conduct prohibited by this Policy, he or she must act with caution, avoiding transmitting to his interlocutor any expectation that could be interpreted as an acceptance of that possible request, and communicating the situation. as soon as possible following the model in Annex 4 (record of communication of risk situations regarding the Anti-Corruption Policy) to the CEO, with a copy to the Compliance Officer, who will decide how to act on a case-by-case basis, recording said decision (in any case Such a request will never be accepted if it is considered to be, or very likely to be, an illegal request).

When a GLOBAL OMNIUM member faces a possible conflict of interest due to personal matters in a purchase or contract, or in submitting to a tender, he or she will inform the CEO as soon as possible, following the model in Annex 4 (communication record). of risk situations regarding the Anti-Corruption Policy), with a copy to the Compliance Manager, so that he can make the decisions he deems appropriate on a case-by-case basis, recording said decision (in any case, the participation of a person in a process in which the that there is a real conflict of interest).

The Compliance Manager will archive the documentation generated and the communications made.

## **6. ECONOMIC CONTROL**

Without prejudice to other internal regulations, the Department of Finance and Control will not accept the request or reimbursement of expenses outside the indicated parameters if the corresponding request and affirmative response are not accredited.

## **7. CONTROL OF RESPONSIBLE**

Annually, the CEO, the General Director and all Department Directors, whether staff of GLOBAL OMNIUM or staff of a business partner acting in the name or on behalf of and for the benefit of GLOBAL OMNIUM, will be required to provide a personal statement in relation to the compliance with this Policy, in accordance with Annex 5 (annual verification form of the Anti-Corruption Policy), the custody of which will be the responsibility of the Compliance Officer.

## **8. POLICY RESPONSIBLE**

The owner of this Policy is the Audit Committee, as the Supervisory Body of the Crime Prevention Management System (SGPD) of Global Omnium, which will manage it as a control of the aforementioned GDPR, with the support of the Compliance Officer.