

# SGCP.POL.01 Anti-bribery and Criminal Compliance Policy

CANVIA (and its subsidiaries), is a responsible company, promoter of an ethical and rule abiding culture, hence, we are committed to the active prevention of illegal conducts, such as: bribery, collusion, influence peddling, money laundering, terrorist financing, the abuse of economic power crime, corruption crime in the private sector, parallel accounting, failure to report suspicious operations or transactions; refusal, delay or falsehood in the provision of information; customs, tax and terrorism crimes; among others stipulated in current regulation. These behaviors, as well as any other regulatory or ethical breach, are strictly prohibited in CANVIA. For this reason, the Senior Executive Management and employees who are part of the company subscribe a "Compliance Commitment" upon joining the organization.

In order to fulfill this commitment, we have implemented a Criminal Compliance Management System [CCMS], that seeks to ensure that both, our employees and our business partners [consortiums, suppliers and clients] - especially those who act on behalf of the company - conduct their business in an ethical way and taking precautions to ensure that identified risks of non-compliance are prevented, detected, investigated and corrected.

The Compliance & SIG Officer has sufficient authority, independence and autonomy to oversee the behavioral guidelines that govern this Program, which are developed in the Code of Ethics and Conduct and other internal policies.

In line with the above, our main guidelines which must be observed by all our collaborators and business partners are the following:

- Comply with the internal policies and laws that apply to CANVIA and its business partners, such as Law N° 30424 which regulates the criminal liability of corporate entities.
- To absolutely reject any proposal of bribery or other improper conduct made by any business partner. Likewise, it is forbidden to make payments, promises of payment or rewards - direct or indirect, in cash or in kind - to public officials, private individuals or their relatives, with the purpose of unduly influencing the decision making process, start or maintain a business or obtain any kind of benefits.

- Facilitation payments, understood as those made to public officials to speed up or facilitate administrative procedures that they are responsible for carrying out, are strictly prohibited.
- Not to send or receive any gift or donation to or from any of our business partners [the prohibition extends to their employees], without having been authorized by CANVIA's Ethics Committee.
- Those who have not previously undergone the respective homologation and approval process may not be suppliers or partners of CANVIA.
- The making of contributions - direct or indirect, in cash or in kind - to political parties, political party representatives and/or candidates for political office is prohibited.
- CANVIA and its business partners are required to record their transactions in the financial statements in a way that accurately reflects the reality of their operations. They must also have adequate monitoring and internal control systems in place.

Through the Ethics Channel on CANVIA's website, we promote the raising of concerns - from any employee or our business partners or the general public - in good faith or on the basis of a reasonable belief, in confidence and without fear of retaliation, of any conduct that does not comply with this Policy.

Any deviation from what is established in this Policy will be promptly analyzed by the Compliance and Human Resources areas, taking into consideration the circumstances that may arise in each case and adopting the appropriate dissuasive and/or disciplinary measures. In the event that a CANVIA business partner is in breach of this Policy, the business relationship may be terminated, as will be informed in the respective contract or service order.

Finally, in CANVIA we are committed to continuously improve our Criminal Compliance Management System.

Hugo Goicochea  
CEO