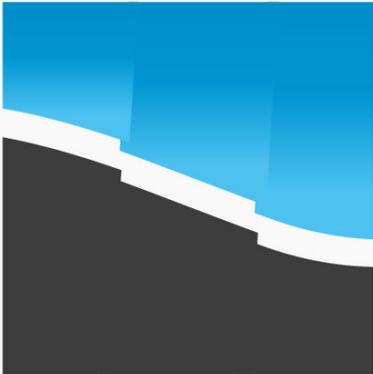


CRIMINAL COMPLIANCE AND ANTI-BRIBERY POLICY



TSK develops its activity, with international presence in different countries, on four continents, by executing “EPC” projects and supplying technological solutions for different industry sectors: electrical infrastructures, industrial plants, power generation plants (conventional or renewable), water treatment plants, Oil&Gas or raw material storage and handling facilities.

Since it was founded, TSK has sought to establish itself as an industry leader. To achieve its objectives, it foments a “corporate culture respectful of the Law,” as well as measures designed to prevent crimes from being committed within the organisation. Through these measures, TSK’s Management is bound by a steadfast commitment to proactively encourage the prevention of crimes by availing itself of the resources used to control company processes. This makes it stand out on the market, guarantee competitiveness and create profitability for shareholders.

In this regards, the Management undertake to:

- Encourage a preventive culture, based on zero tolerance for behaviours that go against criminal law, promoting self-control in established procedures and decision-making for all employees and collaborators, in order to completely comply with criminal law as well as with anti-bribery laws from the countries in which we operate so as to reduce TSK’s exposure.
- Abstain from influencing a public or private person’s will or objectivity from outside TSK to gain benefit or advantage by unethical practice and/ or to applicable legislation.
- Refrain from either directly or indirectly giving, promising, rewarding or offering any asset of value or money to any physical or legal person, with the purpose of getting undue advantages for TSK.
- Provide sufficient human and material resources to guarantee that criminal compliance objectives and anti-bribery are met after evaluating risks.

- Develop the documentation, procedures and systems necessary to prevent crimes from being committed, and establishing supervision, surveillance and control duties necessary to guarantee compliance with criminal law and anti-bribery.
- Guarantee the Ethics Committee’s independence and authority as the entity responsible for supervising compliance with the criminal compliance and anti-bribery system.
- Update and improve the efficacy of the criminal compliance and anti-bribery system, implementing measures that provide for ongoing and regular review of said system, as well as analysis of its performance evaluation.
- Establish ongoing training and consultancy programmes to provide duly trained staff to prevent and detect possible criminal and anti-bribery risks that may appear when carrying out duties.
- Improve communication and information, both internal and external, in all processes related to the criminal compliance and anti-bribery system.
- Forbid, when carrying out duties, any behaviour contrary to this policy, subject to falling under the circumstances set forth by criminal law and anti-bribery, in force for all TSK employees and collaborators, under penalty of disciplinary measures in the event of failure to comply.
- Establish the obligation to report suspicious behaviour through the whistle-blower email address or through any other channel set forth for this purpose, guaranteeing that there are no reprisals for the good-faith informant.
- Share this policy with persons who work for or on behalf of TSK, as well as with interest groups.

To meet this commitment, the President of the TSK acknowledges that it is essential that TSK employees and representatives contribute, participate and be involved. Their knowledge, understanding and awareness of the “corporate culture respectful of the Law” contribute to the efficacy and ongoing improvement of the system itself, as well as to achieving the goals and objectives set, which is why the President is sharing this policy.



** Policy approved by TSK's Chairman Mr. Sabino García Vallina on 24th June, 2019*



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