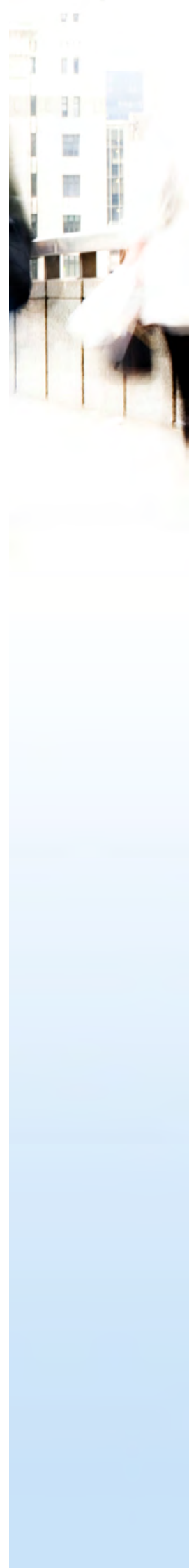




# Corporate Integrity Policy







## TYP SA GROUP CORPORATE INTEGRITY POLICY

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The purpose of the Corporate Integrity Policy is to set out best practice criteria and principles that strengthen and develop the guidelines of our Code of Ethics in the fight against corruption and bribery.

The Corporate Integrity Policy provides an effective tool for preventing the disease of corruption. In an increasingly globalised world, this blight may also affect the procurement of engineering projects and the other areas in which TYP SA Group performs its services.

'Misuse of public power for private gain' is a harmful practice which TYP SA Group absolutely rejects from a moral and economic point of view. Firstly, because it jeopardises the fairness of procurement processes, saps money from projects that are of the utmost importance for development and adversely affects their quality. Secondly, because corruption, in addition to being reprehensible for allowing money to be misused in procurement, is also inherently wrong, as it undermines the values of society and dishonours those who practise it. In short, corruption is not only a question of stealing funds, but also of stealing trust.

Accordingly, TYP SA Group, a leading company in the engineering sector, must neither overlook nor condone corruption and has therefore adopted this Corporate Integrity Policy, which forms part of the Integrity Management System and will be reviewed at least once a year.

### ZERO TOLERANCE FOR CORRUPTION

TYP SA Group undertakes to act in accordance with the highest standards of integrity and requires all its people to behave in line with those principles, strictly subject to applicable law. The Group does not tolerate any form of corruption or criminal activity or any act that breaches our Code of Ethics and the principles of this policy. The practice of such acts by any individual in the performance of their work is strictly prohibited and will lead to severe disciplinary action, including dismissal and contract termination.

TYP SA Group operates in many countries under diverse political regimes, working in compliance with the law and respecting the culture and customs of each country. TYP SA Group considers corruption to be contrary to the public interest, does not encourage it and does not tolerate it, regardless of the country in which it operates.

TYP SA Group expressly prohibits offering, giving, requesting, promising or accepting any form of bribe, whether in cash or in other forms, or adopting any other type of corrupt practice.

### BEHAVIOUR TOWARDS CLIENTS

TYP SA Group will always act with integrity in meeting client interests, thereby honouring confidentiality commitments.

Similarly, the services that TYP SA Group provides to its clients must be governed by the principles of transparency, honesty and impartiality, avoiding conflict of interest and rejecting any reward that might affect the independence of our criteria.

TYP SA Group undertakes to learn about and understand the local laws on corruption and to comply with them. Furthermore, the Group commits to ensuring that all its communications, publications and commercial tools reflect the truth and are ethically correct.

TYP SA Group will only accept work that is within its area of competence and for which it has the technical and business skills that enable it to provide efficient and high-quality services.

### **BEHAVIOUR TOWARDS THE ENGINEERING AND CONSULTING SECTOR**

TYP SA Group will carry out its business using all the competitive practices available to it, staying within the limits of ethics and honesty, respecting the businesses of others and defending at all times the dignity, reputation and prestige of the sector.

### **BEHAVIOUR TOWARD PARTNERS, SUBCONTRACTORS AND AGENTS**

TYP SA Group will base its behaviour on mutual respect and best professional practices. Special care will be taken to ensure that its partners, subcontractors and suppliers are not involved or suspected of having taken part in corrupt practices. To this end, appropriate control measures will be taken, including clauses in contracts that provide for contract termination if evidence of this type of practice emerges.

TYP SA Group will monitor the actions of independent agents or commercial advisors in certain countries to ensure their performance complies with the rules laid down in its Integrity Policy and conforms with its ethical practices. Their remuneration must always be appropriate and justifiable, commensurate with the work done and at market cost for the type of services they provide. All contractual commitments undertaken with the aforementioned agents must conform to international standards with endorsed and recognised respect for the ethical principles of the profession.

All TYP SA Group partners, subcontractors and agents must immediately report any conflict of interest affecting the exercise of their professional activity as soon as they become aware of it and resolve it as soon as possible.

### **BEHAVIOUR OF OUR PEOPLE**

Commitment to complying with the Integrity System is a requirement for obtaining employment in any of the TYP SA Group companies and compliance with the System is mandatory in the performance of the functions assigned.

TYP SA Group does not allow the people forming part of the organisation to use its facilities, or any information obtained from the company, to engage in illegal activity, through act or omission, for the benefit of TYP SA or for their personal gain.

### **GIFTS AND HOSPITALITY**

While we acknowledge that some countries and cultures accept gifts and hospitality as a normal expression of diplomacy and courtesy, TYP SA Group employees and collaborators must not accept any type of reward or favour or promise made in an attempt to influence the impartial performance of our services, neither must they offer them to influence a decision in our favour.

### ILLEGAL COMMISSIONS

TYP SA Group believes that illegal commissions given to members of the public authorities to facilitate or expedite official processes are a form of bribery and, therefore, these are not permitted within Group company operational procedures, unless personal security or freedom is under threat.

### POLITICAL PARTIES

TYP SA Group expressly prohibits payments or donations to political parties in order to obtain competitive advantage.

### DONATIONS TO ORGANISATIONS

TYP SA Group prohibits contributions to any organisation that may use them for illegal purposes.

### TRAINING AND COMMUNICATION

TYP SA Group will provide the appropriate training, through classroom and online courses, to all its people to ensure that they know and apply the Code of Ethics, the Corporate Integrity Policy and all other system documents. This training will be part of the general training given to all new employees when joining the Group.

### WHISTLEBLOWING

TYP SA Group has internal and external whistleblower channels in place to report breaches of the Integrity Management System. These channels allow any worker or stakeholder to express their suggestions, suspicions or concerns with full guarantees of confidentiality and anonymity, offering protection against retaliation whenever reports are made in good faith.

Furthermore, TYP SA Group is committed to fully cooperating with any legally constituted body legitimately authorised to investigate cases of corruption and bribery that requires our collaboration.

### CONTROL BODY

TYP SA Group has independent control bodies with the authority and autonomy to implement and monitor compliance with the Integrity Management System.



