



# Corporate Integrity Policy



## CORPORATE INTEGRITY POLICY

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TYPSA Group (or hereinafter also TYPSA), launched a new corporate integrity policy in November 2015 with the purpose of adopting best practice criteria and principles to strengthen and develop the guidelines outlined in the Code of Ethics implemented by the Group. This policy forms an essential part of TYPSA's Integrity Management System (IMS).

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 the TYPSA Group performs its services.

'Misuse of public power for private profit' is a harmful practice which the TYPSA Group absolutely rejects from a moral and economic point of view. Firstly, it jeopardises the fairness of procurement processes, saps money from projects that are of the utmost importance for development and adversely affects quality. Secondly, and in addition to being reprehensible from a pragmatic point of view for allowing money to be misused in procurement, corruption is also inherently wrong, as it undermines the values of society and dishonours those who practise it. In short, it is more than stealing funds; it is stealing trust.

Thus, TYPSA Group has been developing a series of policies tending towards zero tolerance. Indeed, a leading company in the engineering sector must neither overlook nor allow corruption and therefore the Corporate Integrity Policy shown below constitutes, as already indicated, a development of the position that the Group defends through its Code of Ethics.

## COMMITMENT

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TYPSA Group undertakes to act in accordance with the highest ethical standards and requires its employees to behave likewise, strictly subject to applicable law. The Group does not tolerate any form of corruption or criminal activity or any act that breaches the rules of conduct and procedures contained in the integrity management system. The practice of such acts by Group employees in the performance of their work is strictly prohibited and shall lead to severe disciplinary action, including dismissal.

TYPSA Group operates in many countries under diverse political regimes, working in compliance with applicable law and respecting the culture and customs of each country. TYPSA Group considers corruption to be contrary to the public interest, and neither encourages nor tolerates it, regardless of the country in which it operates.

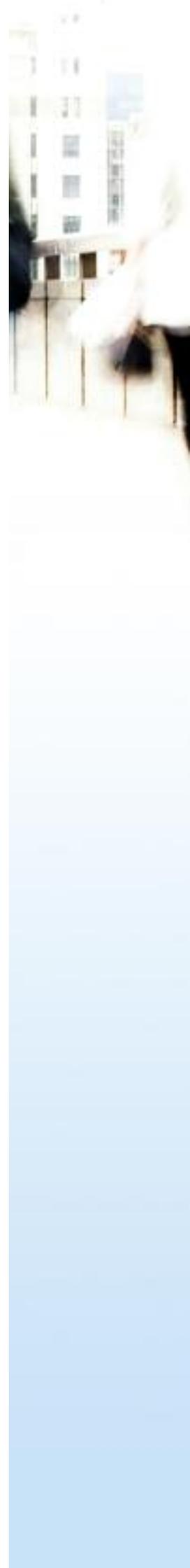
TYPSA Group expressly prohibits offering, giving, requesting, promising or accepting any form of bribe, whether in cash or in other forms, or adopting any other type of corrupt practice.

The principles that underpin the business and personal behaviour of the Group's companies and its employees are set out in this document, which will be reviewed annually or when deemed necessary.

## RESPONSIBILITY

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The Compliance Body must be vested with the independence and authority to carry out the function of implementing and monitoring compliance with the Corporate Integrity Policy at TYPSA.





Effective compliance with the Corporate Integrity Policy will be monitored through the TYP SA Integrity Management System, which includes a manual and a series of procedures.

#### **BEHAVIOUR TOWARDS CLIENTS**

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

Similarly, the Group undertakes to learn about and understand the local laws on corruption and to report any criminal behaviour to the competent authority. Furthermore, the Group is committed to being truthful and ethically correct in all its communications, publications and tools for commercial use.

TYP SA Group shall 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.

With respect to its competitors, the Group will use every competitive practice within its reach without crossing any ethical boundaries and without misrepresenting information about competitors.

#### **BEHAVIOUR TOWARDS PARTNERS AND SUPPLIERS**

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TYP SA Group shall base its relationship with partners, subcontractors and suppliers on mutual respect and best professional practices. Special care will be taken to ensure that the partners, subcontractors and suppliers the Group works with are not involved, or suspected of having taken part, in corrupt practices. The Group will introduce clauses into its contracts with them that allow for termination as soon as evidence of this type of practice is discovered.

TYP SA Group will monitor the behaviour of certain countries' independent agents or representatives to ensure that their performance complies with the rules laid down in the Group Integrity Policy and conforms with its ethical practices. Their remuneration must always be 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 shall conform to international standards with endorsed and recognised respect for the ethical principles of the profession.

#### **BEHAVIOUR TOWARDS STAFF**

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TYP SA Group does not allow its staff to use its facilities or any information obtained from the company to engage in any illegal activity, through act or omission, for the benefit of TYP SA or for their personal profit. Every TYP SA employee or collaborator must notify and immediately settle any conflict of interest that they encounter in their daily work.

Adherence to the principles of TYP SA Group's Corporate Integrity Policy is a necessary requirement for obtaining employment in any of the Group companies.

#### **GIFTS AND HOSPITALITY**

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While we acknowledge that some countries and cultures accept gifts and hospitality as a normal expression of diplomacy and courtesy, TYP SA Group staff must avoid situations that may interfere or seem to interfere with the performance of their work and, in any case, never accept or offer gifts or

hospitality with the intention of influencing a person to act dishonestly in the exercise of his or her professional duties, favouring TYP SA directly or indirectly.

### **ILLEGAL COMMISSIONS**

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TYP SA Group believes that illegal commissions delivered to members of public administrations to facilitate or expedite official processes are a form of bribery and, therefore, these are not allowed as part of Group company and employee operational procedures, unless personal security or freedom is under threat.

### **CONTRIBUTIONS TO POLITICAL PARTIES OR OTHER ORGANISATIONS**

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TYP SA Group expressly prohibits payments or donations to political parties for competitive advantage, as well as donations to charitable organisations or other types of organisation with illegitimate or spurious purposes.

### **BREACH REPORTING**

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TYP SA Group has established internal communication channels for filing complaints regarding violations of its Integrity System, including confidential channels through which employees can express their suspicions or concerns.

Moreover, TYP SA Group undertakes to collaborate with other organisations looking to reduce corruption.

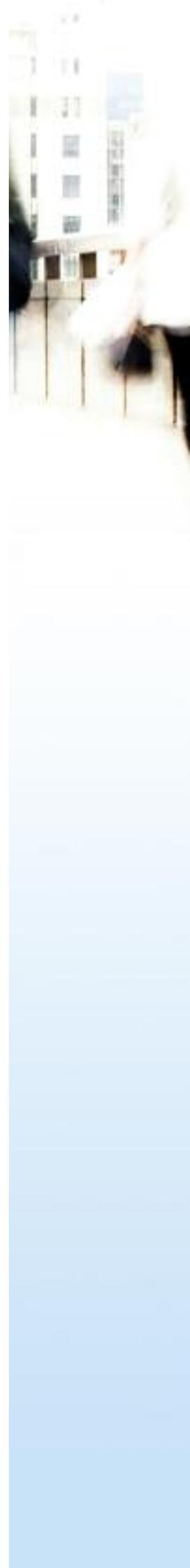
### **TRAINING, COMMUNICATION AND CONTINUOUS IMPROVEMENT**

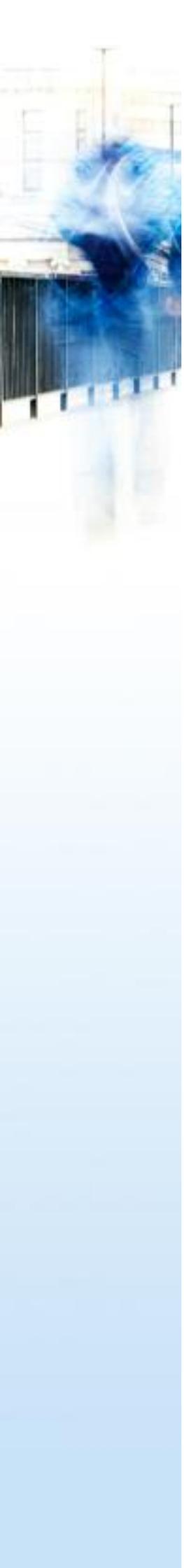
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TYP SA Group will provide appropriate training, through classroom and online courses, to all its employees to ensure that they are aware of and apply the Corporate Integrity Policy and all other system documents. This training will be part of the general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

Every TYP SA employee and collaborator must report any suspicious behaviour or incident relating to criminal risks — as described in the Integrity Management Manual — through the channels provided. Under no circumstances shall the whistle blower be subject to any form of retaliation.

The Compliance Committee is responsible for continuously reviewing and improving the Integrity Management System.





## ANNEX

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TYPSA Group defines the following as corrupt practices:

- **Active bribery:** directly or indirectly offering, promising or giving a gift, payment or other benefit to a public worker or private client to influence his or her decisions or actions.
- **Passive bribery:** directly or indirectly requesting payment or any other benefit to influence or modify any pending decisions or actions.
- **Fraudulent practice:** an act or omission, including the misrepresentation of facts and circumstances, that deceive or attempt to deceive any of the parties to obtain a financial or other benefit or to avoid an obligation.
- **Collusive practice:** an agreement between two or more parties made with the intention of achieving an inappropriate purpose or even improperly influencing the actions of other parties.
- **Coercive practice:** involves directly or indirectly causing harm or damage or threatening to cause harm or damage to any of the parties to influence their actions or decisions.



[www.typsa.es](http://www.typsa.es)