



Criminal and Anti-Bribery Compliance Policy

LIC

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Aware of the importance of Business Ethics as a differentiating factor, **LEVANTINA INGENIERÍA Y CONSTRUCCIÓN (LIC)**, an international construction company dedicated to the execution and maintenance of large civil works infrastructures and unique building works, establishes the following Criminal and Anti-bribery Compliance Policy to identify it as a responsible company aware of its performance to ensure the improvement of its Reputation.

The Governing Body is committed to ensuring that this policy is understood, implemented and maintained at every level of the organization and disseminated to all stakeholders.

To achieve this purpose, the Governing Body of LIC declares its commitment and responsibility in the implementation, maintenance and continuous improvement of a Management System for the Prevention of Criminal Offences based on the UNE-19601:2017 standard, and an Anti-Bribery Management System based on the ISO-37001:2017 standard, focused on adopting and achieving the following:



ACTIONS

Promote a Culture of Compliance at LIC.

Encourage each person to understand and internalize that they are responsible for protecting the integrity and good reputation of LIC through strict compliance with the Law. This implies a particular focus on applicable anti-bribery and criminal legislation and making the right decisions in each case, expressly prohibiting bribery and other offences.

Promote the identification, evaluation and monitoring of criminal risks that could occur at our company to prevent or minimize them through the appropriate objectives, actions and procedures in compliance with the requirements assumed by LIC.

Establish the obligation for members of LIC to report incidents or indications that represent a risk to compliance with the requirements assumed or are against the Criminal and Anti-Bribery Compliance System, guaranteeing that the informant will not suffer reprisals of any kind.

Apply a disciplinary regime based on the principles of appropriateness and proportionality to punish behaviour contrary to the ethics or professional conduct LIC expects of all its professionals, or that involves a breach of this Policy, the Law or the internal rules and regulations in force at any given time.

The Governing Body appoints and authorizes the Compliance Body in accordance with the principles of independence, the absence of conflict of interest and the adequacy of resources that ensure its effectiveness. The Compliance Body is entrusted with the supervision, monitoring and control of the effective implementation of the Criminal and Anti-Bribery Compliance System at every level of the organization.

Similarly, the Governing Body calls upon and engages all staff to comply with this Anti-Bribery and Criminal Compliance Policy and achieve the targets set accordingly.

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ARMENIA

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