

Anti-corruption Policy

1. Introduction

The OBRAS SUBTERRÁNEAS INC. (hereafter OSSA or the Corporation) Code of Ethics prohibits the corrupting or bribing of authorities or officials as well as any form of soliciting benefits from or offering the same to third parties.

Furthermore, it imposes a conduct governed by values of integrity, honesty and professional ethics upon all those who form a part of the organization.

2. Policy summary

The object of this Policy is to determine the necessary measures for the prevention, detection and sanctioning of fraudulent acts and the use of the Corporation's activities and means to obtain economic or other benefits.

3. Scope

This Policy is applicable to all employees, managers and members of the administration of OSSA and refers to both individual and joint actions taken by, or on behalf of, the Corporation.

It applies to all OSSA group societies, including subsidiaries and joint ventures in which the Corporation may have controlling interests.

This Policy extends to all activities, processes and relationships established by the Corporation and its employees, at all levels, be they formally drawn up in a contract, policy, procedure or similar, or be they custom or common practice.

4. General requirements

All OSSA employees are forbidden to offer, promise or initiate, whether directly or indirectly, illicit payments of money or any valuable goods to third parties, be they natural persons, government officials or employees of private entities, national or foreign, with the purpose of obtaining or retaining any type of business, favor or interest.

It is expressly prohibited to retaliate against any person who, in good faith, communicates the occurrence of these practices within the Corporation to the pertinent parties in the Corporation or the authorities.

Moreover, OSSA guarantees that it will keep its books and accounting records precisely, as well as maintain an adequate system of internal accounting controls.

Bribes

- ✓ All OSSA employees, as well as any person or entity working on behalf of or in representation of OSSA, are not permitted to offer, carry out, promise or authorize the undue payment of any sum of money or valuable goods, whether directly or indirectly, to any government official, political party, representative or member thereof, or candidate for a political office, with the purpose of providing, obtaining or

retaining any dishonest business, favor, interest or advantage for OSSA, nor with the purpose of:

- Influencing any act or decision of the intended recipient in the performance of their function.
 - Inducing the intended recipient to act or cease acting in any way that might constitute an infraction of their legal duties.
 - Inducing the intended recipient to use their influence in the state, regional or local administration, in the government, or in a public company with an aim to alter or influence any act or decision of these.
- ✓ Any decision to favor OSSA with preferential conditions or to provide confidential or private information that could give the Corporation a dishonest advantage is also included in this forbiddance.
- ✓ Any undue payments carried out in the Corporation's name by third parties, such as persons who recommend the Corporation's products or services, advisers and intermediaries, are also considered infractions of anti-bribery laws.

Preventive measures to avoid corruption

- ✓ All expenses charged to OSSA accounts or paid on behalf of OSSA must be duly documented by way of invoices or payment receipts, and included in the corresponding settlement of expenses. These expenses must always be checked and approved by the person in charge of the employee or a superior, and afterwards reviewed by the accounting department in order to confirm correct documentation and reasonableness.
- ✓ Payments will be made preferably against invoices issued to OSSA. This rule applies especially to travel, hotel, meal and representation expenses, etc. When personalized methods of payment are used (company credit cards), the corresponding receipts, or invoices as the case may be, must be presented.
- ✓ All expenses will be registered in the Corporation's accounting, with the degree of detail required by the applicable laws.
- ✓ No payments will be made toward speeding up administrative processes, nor for obtaining permits, licenses, authorizations or the like, unless these are required by law, as is the case with taxes or public prices.
- ✓ All donations made for charitable purposes must be authorized by the Compliance Committee.

In order to comply with this Policy and anti-corruption laws, OSSA will create and keep the books, records and accounts of its activity with absolute transparency, carrying out internal controls to ensure proper compliance.

All expenses and payments, whatever their nature, must be notified and registered in a precise and timely manner, and all supporting documentation must be kept for the duration of a period established by the Corporation.