

Information Confidentiality and Privacy Policy

1. Introduction

The OBRAS SUBTERRÁNEAS INC. (hereafter OSSA or the Corporation) Code of Ethics recognizes that the Corporation's activity can generate knowledge and information of a commercial, technical or any other nature, the value of which resides to a great extent in its being withheld, and requires that any information accessed be used discretely and professionally, maintaining its due confidentiality.

In addition, it guarantees the confidential treatment and privacy of all third party data in its possession.

Lastly, OSSA is committed to adopting all necessary measures in order to preserve the confidentiality of the personal information at its disposal.

2. Policy summary

The aim of this Policy is to set forth the requirements by which each member of the Corporation is to handle information originating within the same, protecting said information, as well as preventing its unauthorized divulgence to third parties.

For the purposes of this Policy, the following shall be considered **Confidential Information**:

- ✓ Employee, client and supplier information, as well as that of other third parties related to OSSA, that has not been publicly shared by the Corporation within the limits of legality and in the performance of its activity, or by the owners of the information.
- ✓ Documentation directly or indirectly influencing the conducting of business (technical procedures, offers, projects, studies, analyses, contracts, strategic plans, etc.) that has not been publicly shared by the Corporation.
- ✓ Procedures, policies, instructions, processes, techniques, formulas, and all knowledge that has not been publicly shared by the Corporation.
- ✓ Client, supplier, and third party information provided to OSSA under an agreement of confidentiality.

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 corporations in the OSSA group, 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

Obligation of discretion, secrecy and confidentiality

Divulging confidential information, whether intentionally or accidentally, can result in serious damage to the Corporation's image, commercial and financial stability, and its relations with employees and associated third parties. Hence, with the objective of ensuring information is handled with the necessary degree of secrecy and confidentiality, the following guidelines are set forth:

- All employees, managers and members of the administration must fulfill their duty of discretion, secrecy and confidentiality with regard to the Confidential Information to which they have access for the performance of the tasks of their position or those corresponding to their participation in the different committees or groups that exist in the Corporation.
- Confidential Information is to be used for legitimate purposes and in a responsible and honest manner, always in compliance with the Organic Law of Data Protection and other regulations for safeguarding the confidentiality of information.
- The duty of confidentiality must be fulfilled according to the terms established in any contracts entered into with different clients, suppliers and other third parties with which the Corporation may have dealings.
- No employee, manager, or member of the administration may, neither during the course of their labor or business relationship nor once it has ended, share any Confidential Information without due authorization from OSSA.
- The Compliance Committee must be informed immediately of the following:
 - Any use, sharing and/or publication of Confidential Information by other employees.
 - Any attempt by a third party outside of the Corporation to obtain Confidential Information from an employee.

Established measures for ensuring confidentiality

- Inclusion of a confidentiality clause in contracts and agreements drawn up by the Corporation, when appropriate.
- Signing of a confidentiality document by the contractors, subcontractors, consultants, and other individuals or entities outside of the Corporation that might have access to some of its private and confidential information in the course of their job.
- Restricted access to information available on the internal computer network.
- Specific training for the personnel handling sensitive confidential information, within the Corporation.