



COMPLIANCE POLICY

Compliance Policy

The Management of A. Copitrans S.L. aware of the desirability of defining and writing its Criminal Compliance Policy, has decided to implement a Criminal Compliance Management System with the aim of Provide your services In accordance with the procedures of the system, and to assure the parties concerned in general compliance with the penal legislation applicable to the company and the requirements established in the Criminal Compliance Management System.

The Penal Compliance Policy of Copitrans S.L. establishes the obligation to:

- Compliance with criminal law applicable to the company
- The Prohibition of the Commission on Criminal offences
- The Company's minimum exposure to criminal risks
- The establishment of an appropriate framework for the definition, revision and achievement of the objectives of Criminal Compliance
- The obligation to report suspicious acts or behaviors relating to criminal risks, guaranteeing that the informant will not suffer reprisals.
- To Acquire a commitment to the continuous improvement of the Criminal Compliance management system
- Granting the necessary authority and independence of the Criminal Compliance Body
- The assumption of the consequences of not complying with the requirements of this policy, as well as those arising from the Criminal Compliance Management System.

This policy applies to all activities in which crimes may be committed which must be prevented. It is available as documented information for all the personnel of Copitrans. S.L. in the INTRA application, as well as available on the Web www.copitrans.com for business partners and stakeholders as appropriate.

In Valencia, a January 28, 2020

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