

COMPLIANCE POLICY

Compliance Policy

The Management of A. Pérez y Cia. S.L. aware of the desirability of defining and recording in writing its Criminal Compliance Policy (hereinafter “The Compliance Policy”, has decided to implement a Criminal Compliance Management System (the CCMS) in order to ascertain that the services are provided in accordance with the established procedures of the system. With the object to assure to the interested parties the compliance with the applicable criminal legislation and requirements established in the CCMS.

The Penal Compliance Policy of A. Pérez y Cia. S.L. includes, among others, the following obligations:

- The compliance with the applicable criminal legislation
- The Prohibition of 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 CCMS
- The obligation to report suspicious acts or behaviors related to criminal risks, guaranteeing that the informant will not suffer reprisals.
- The commitment to continuously improve the CCMS
- Granting the necessary authority and independence of the Criminal Compliance Body
- The acceptance of the consequences of not complying with the Compliance Policy requirements, as well as those arising from the CCMS

Said policy applies to all activities in which criminal acts may be committed, and therefore must be prevented. The Policy is available (document form) to the Company's personnel in the Compliance/Anti-Bribery Pérez y Cia's application, as well as available on the Web www.perezycia.com for business partners and stakeholders, as appropriate.

In Madrid, May 13th 2019

Javier Ferrer Muñoz-Seca
Chairman