

JUNE 2023

CRIMINAL RISK PREVENTION POLICY



Scope of application

The Criminal Risk Prevention Policy applies to all members of IDE Electric.

"Members" are considered to be anyone forming part of the Board of Governors; the General Management; the Heads of Department, the personnel who offer their services on behalf of IDE, regardless of the mode or duration on their contract; advisors; lawyers, and consultants.

IDE will promote the application of that laid out in this Policy, where applicable, to their customers; suppliers; service providers and other third parties with whom they have relations in the exercise of their activity.



Commitment of the board of governors

The Board of Governors is responsible, among other things, for formulating the strategy and approving the Criminal Risk Prevention Policy of the company, and for organising the internal management systems with the aim of maintaining strict control of the compliance with the applicable legislation, the ethical principles and internal regulations.



With this Policy, the Board of Governors demonstrates the firm commitment of the company and of all its members to:

Know and strictly comply with the applicable legislation relating to the development of the company activity, and to respect in full the obligations and commitments assumed in their contractual relations with third parties.

Provide all the necessary means and resources to promote, where applicable, the prevention, control, detection and sanction of the illegal or unethical acts and behaviour that may take place within the company.

Observe the general principles for the prevention of crime listed in the Manual of the Criminal Risk Management System and compliance with the Code of Conduct; and with the other internal legislation and risk controls established

To maintain honest and unabridged attitude in all their activities and, therefore, be opposed to any form of illegal act, criminal or of any other nature.

Avoid any form of corruption by observing the particular needs and circumstances of all the subjects involved in the business and professional activities of the company.

This commitment to zero tolerance and opposition to the committing of any class of illegal act, and to maintaining a company culture of honesty, integrity and ethics is promoted by the Board of Governors and by the General Management of IDE, and must be fulfilled by all members of the company and their interested parties.

Consequently, strict compliance with the law, with this Policy, the Code of Conduct, and the other internal regulations of the Integrated Management System and the Criminal Risk Management System (hereinafter, SGRP or Compliance), is obligatory for all members of IDE; such that the relevant disciplinary measures will be adopted, case by case, to sanction any breach to this effect.



As evidence of this firm commitment, IDE has set up a System of Compliance and appointed a Compliance Committee, with autonomous powers of initiative and control, responsible for the development, supervision and monitoring of the Compliance Management System; having been assigned the resources, independence and authority necessary for the development of their duties.



IDE also has an Ethics Channel, as a completely anonymous communication channel, which is available to all employees and interested third parties, so that they can report any suspicion or knowledge of actions or omissions that constitute breaches of European Union Law, or that may constitute a serious or very serious criminal or administrative offence; as well as conduct contrary to this Policy, the Code of Conduct and other internal regulations of IDE.

Approval, validity and review

This Criminal Risk Prevention Policy has been approved by the Board of Governors and is valid indefinitely.

The Compliance Committee, with the support of the Department of Quality, where applicable, for the integrated management of the management systems, will regularly review the present Criminal Risk Prevention Policy and recommend to the Board of Governors the modifications and updates which contribute to their development and continuous improvement, addressing where applicable the suggestions and proposals put forward by the members of IDE or other interested parties.

Board of Governors

IDE Electric, SL



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