

Criminal and Anti-bribery Compliance Policy

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This **“Criminal and Anti-Bribery Compliance Policy”** reflects that the Titan Group has and permanently exposes a high commitment to the development of its activities with the highest level of ethics and compliance with current legislation.

Being one of the documents that make up the Criminal and Anti-Bribery Compliance System, it is linked to the values of the Code of Ethics and Conduct, ratifying the willingness of this organization to maintain a behavior that respects both the rules and its ethical values, defining its framework of principles of compliance in criminal and anti-bribery matters.

The conviction with the implemented ethics and compliance policy is best represented in the governing bodies and senior management, which promote, comply with and enforce the protocols, policies and procedures necessary to maintain and reinforce this compliance culture. In this sense, it is a text aligned with the Group’s strategic objectives and, consequently, with its determination not to tolerate any behavior that could constitute bribery or any other crime.

The “Anti-Bribery and Criminal Compliance Policy” is **applicable** to all persons belonging to the Titan Group companies (including directors, managers and employees), to entities or persons collaborating with the Group, whether they are suppliers, distributors, customers, external professionals or representatives of the company who do not have equivalent internal regulations, as well as to any interested party. It is applicable in the development of all its activities and in any place where they are carried out.

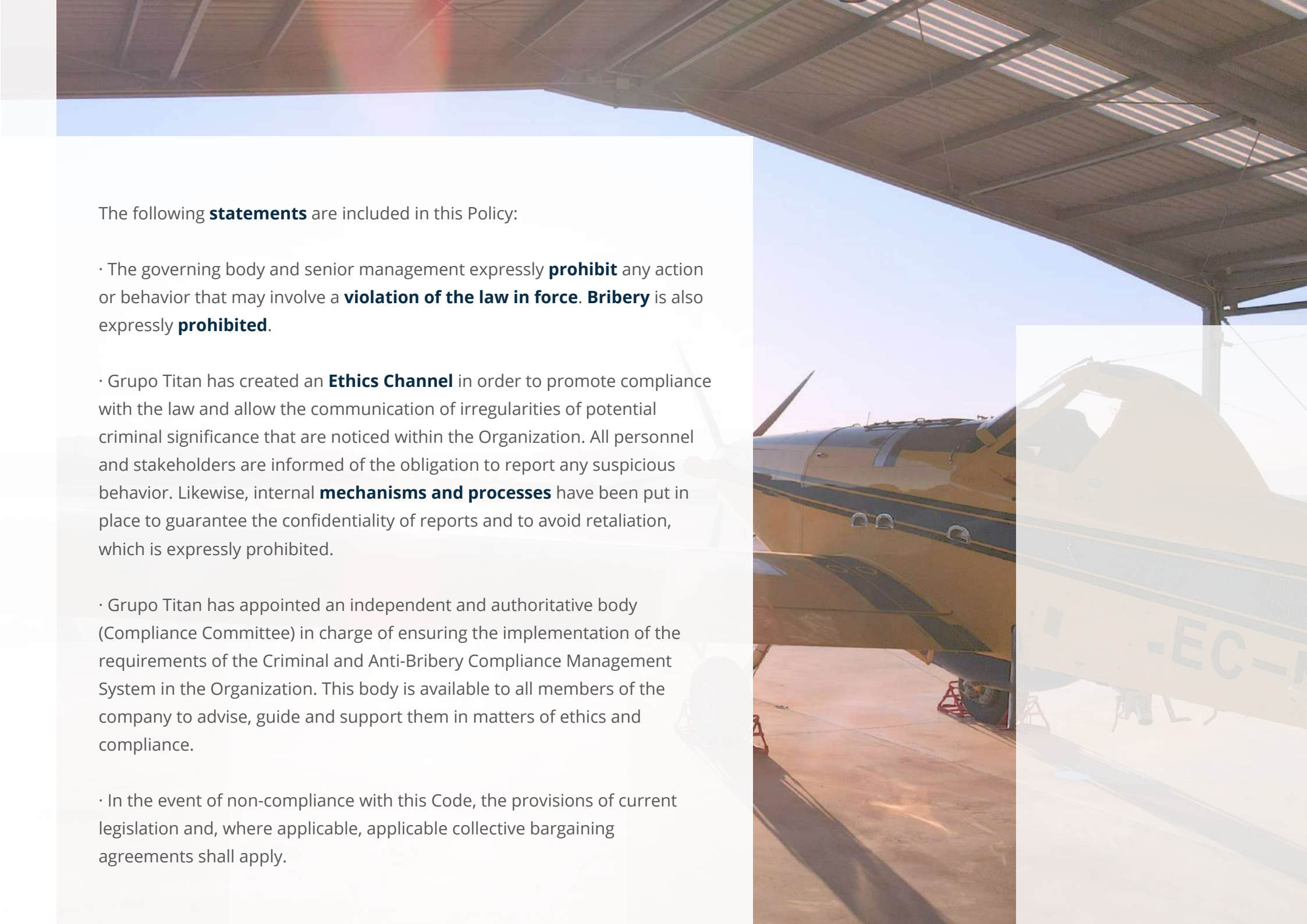
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Among its main **objectives** are:

- To prevent actions or behaviors that violate current legislation, paying special attention to compliance with anti-bribery laws, or are perceived as ethically unacceptable.
- To train and raise the awareness of the people to whom this policy is applicable about the criminal risks to which their actions are exposed, as well as the appropriate response mechanisms established by the Group.
- Continuous improvement of the management system by proposing a framework for defining, reviewing and achieving specific criminal and anti-bribery compliance objectives.

The following **statements** are included in this Policy:

- The governing body and senior management expressly **prohibit** any action or behavior that may involve a **violation of the law in force. Bribery** is also expressly **prohibited**.
- Grupo Titan has created an **Ethics Channel** in order to promote compliance with the law and allow the communication of irregularities of potential criminal significance that are noticed within the Organization. All personnel and stakeholders are informed of the obligation to report any suspicious behavior. Likewise, internal **mechanisms and processes** have been put in place to guarantee the confidentiality of reports and to avoid retaliation, which is expressly prohibited.
- Grupo Titan has appointed an independent and authoritative body (Compliance Committee) in charge of ensuring the implementation of the requirements of the Criminal and Anti-Bribery Compliance Management System in the Organization. This body is available to all members of the company to advise, guide and support them in matters of ethics and compliance.
- In the event of non-compliance with this Code, the provisions of current legislation and, where applicable, applicable collective bargaining agreements shall apply.





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