

Criminal Compliance Management System Policy

CMS Grau

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Introduction

Grau Civil Society Limited Liability ("CMS Grau") is a private entity organized with the purpose of providing consulting services and legal advice in relation to a wide variety of topics, such as financial, corporate, environmental, procedural, criminal, mining, energy and oil, among others.

Compliance

CMS Grau aims to run its business in accordance with the applicable regulatory framework, aiming to follow the highest ethical standards in all its actions. This being the case, CMS Grau is committed to work guaranteeing transparency in its business from a "zero tolerance" perspective against any practice or conduct aimed at money laundering, terrorist financing and corruption that allows CMS Grau to obtain an undue advantage. The content of this policy is applicable to the members that make up CMS Grau and is brought to the attention of its business partners, such as suppliers and customers.

Criminal compliance management system

CMS Grau has a criminal compliance management system through which it manages the risks inherent to its activities in order to prevent, detect and deal with them, in compliance with the requirements established in the International standard ISO 37001:2016 - Anti-bribery Management Systems.

Raising concerns

CMS Grau attends, through the corresponding channels, the concerns presented opportunistically and promotes the good faith report of the events that, duly founded, are pertinent to the criminal compliance management system, guaranteeing that there will be no reprisals against the reports made.

Compliance Committee

CMS Grau has a compliance committee to ensure the effectiveness of the criminal compliance management system. This committee acts as a body with full authority and functional independence in CMS Grau.

Continuous improvement

CMS Grau is committed to continuously improve its criminal compliance management system.

Non-compliance

Failure to comply with this policy generates repercussions of a legal, operational, economic and image nature, putting at risk the reputation and continuity of the activities developed by CMS Grau.

This policy provides the frame of reference to establish, review and achieve the objectives of the criminal compliance management system of CMS Grau.



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