

COMPLIANCE PROGRAM

ENERSIDE ENERGY GROUP

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MANUAL OF RISK ANALYSIS AND PREVENTION OF CRIMINAL

I GENERAL PART

1. Introduction

- (1) This Manual Analysis and Risk Prevention Criminal (hereinafter the "Manual") establishes the organizational model, prevention, management and control of criminal risks in Spain Enerside Energy, SL (hereinafter "Enerside") and the rest of the group companies, irrespective of their nationality or domicile socially in accordance with the definition contained in Article 42 of the Commercial Code regarding the regime of criminal responsibility of legal persons established in art. 31a of the Penal Code.
- (2) Considering the regulatory changes brought in criminal matters, Enerside has developed a plan to prevent the commission of crimes in order to compile the procedures and controls that currently exist for the effective prevention and criminal risk mitigation.
- (3) Therefore, it has conducted a detailed analysis of risks criminal can potentially occur in different areas of business Enerside.
- (4) This Handbook is based on the existing control systems and those who, following the review as a result of the provisions of art. 31a of the Penal Code have been strengthened or introduced into Enerside to fulfil in order to prevent and mitigate the crime.

2. Criminal Liability regime Legal Persons in Enerside

2.1. Regulatory context

- (5) On December 23, 2010 came into force Organic Law 5/2010, reforming the Penal Code, which regulates, for certain offenses, criminal liability of legal persons as a result of numerous international legal instruments that have been asking for a criminal response clear to define this special responsibility, especially in those offenses where a possible intervention became more evident. Article 31.1 bis of the Penal Code regulates the liability of legal persons as follows:
 - a. Crimes committed on behalf or on their behalf, on their direct or indirect benefit, by their legal representatives or by those who individually or acting as part of an organ of the legal person, are authorized to make decisions on behalf of the person legal or hold powers of organization and control within it.
 - b. Crimes committed in the exercise of social activities for and on direct or indirect benefit of themselves, who, being under the authority of individuals mentioned in the preceding paragraph have been able to make the facts have seriously failed by those duties of supervision, monitoring and control of their activity addressed the specific circumstances of the case.

2.2. Enerside and related companies

- (6) Enerside Energy, SL and its affiliates are a group dedicated to the development of renewable energy projects; design and engineering, regulatory and technical compliance; as well as

operation and maintenance for perfect operation. All with the aim of offer viable, profitable and sustainable energy solutions that allow widespread access of the population to renewable energy.

3. Purpose of the Manual and control measures

3.1. Purpose of the Manual

- (7) The reform introduced by the Organic Law 1/2015 introduces important changes, among which the new Article 31a of the Penal Code, which literally exempt from criminal liability to the legal person in cases of crimes committed by representatives and administrators when:
- a. The board has adopted and effectively implemented, before the crime, organizational models and management including surveillance measures and good control to prevent crimes of the same nature or significantly reduce the risk of their commission;
 - b. Monitoring performance and compliance with prevention model implemented has been entrusted to an organ of the legal person with autonomous powers of initiative and control or has legally tasked with monitoring the effectiveness of internal controls of the legal person;
 - c. Individual authors have committed the offense fraudulently eluding the models of organization and prevention; Y
 - d. There has been no omission or insufficient exercise of the functions of monitoring, surveillance and control by the supervisory body.
- (8) Also the art. 31.bis.4 the aforementioned Penal Code provides that the legal entity shall be exempt from responsibility for crimes committed by their employees if, before the offense, has adopted and effectively implemented an organization and management model that is appropriate to prevent the nature of the crimes that were committed or to reduce significantly the risk of their commission.
- (9) 1/2015 Organic Law establishes that for the model of organization, management and prevention for criminal risk mitigation is effective:
- a. activities within which crimes can be committed that must be prevented are identified.
 - b. protocols or procedures that embody the process of forming the will of the legal person, making decisions and implementing them in relation to those established.
 - c. It is available management models appropriate to prevent the commission of crimes that must be prevented financial resources.
 - d. the obligation to report potential risks and breaches the agency responsible for monitoring the operation and enforcement of the prevention model is imposed.
 - e. a disciplinary system that adequately punish failure to comply with the measures established by the model is established.
 - f. Periodic verification thereof and their possible modification when relevant reveal violations of its provisions, or when changes in the organization, control structure or the activity that make them necessary.
- (10) In addition, Article 31.1 of the Penal Code provides quáter extenuation of responsibility of the

legal person, among others, the following:

- a. Having established before the start of the trial, effective measures to prevent and detect crimes that could be committed in the future with the media or under the cover of legal entity measures.
- (11) Therefore, the main objective of this manual is to: (i) ensure the effectiveness of standards and control procedures that minimize the risk of illegal behaviour by employees Enerside; and (ii) prove that it has exercised due control over their business, thus fulfilling the requirement under the Penal Code.
- (12) To this end, it has been defined in this Manual Model Criminal Risk Prevention adopted by Enerside, and defined in:
- a. General part: it includes the design and structure of (i) scope and adoption of the model; (ii) prevention model elements; (iii) financial management system resources; (iv) control body; and (v) supervision model.
 - b. Special part: Identifies criminal risks that may hypothetically occur in Enerside because of the activities it performs, along with the susceptible control framework to mitigate and body responsible for its supervision.
- (13) This Handbook is a dynamic document, so it will be reviewed at least annually, in relation to criminal risks that may affect the company and, if applicable, shall be maintained.
- (14) Consequently, it has established the Criminal Prevention Model Risks assumed by Enerside by taking the necessary measures of surveillance, monitoring and control to prevent criminal risks that may be committed within the Company as a result of their activity. In this regard, (i) have been granted autonomous powers of initiative, control and monitoring Compliance Unit; and (ii) it has determined the application of a disciplinary system as a reactive measure to breaches of the rules on criminal risk prevention may be committed.

3.2. Methodology and risk analysis

- (15) Specifically, to establish control over business activities because of Enerside and preparing this Manual has proceeded to conduct a thorough review of existing controls in the Company. The review consisted of the following actions, some of which are developed throughout this Manual:
- a. They have examined the activities, processes, threads and controls developed by Enerside in Spain.
 - b. They have been located hypothetical criminal risks in the various activities carried out by Enerside.
 - c. We reviewed policies, manuals, procedures and contract-model most relevant Enerside.
 - d. It has verified the adequacy of manuals, procedures and controls to promote effective criminal risk prevention and proper custody of the supporting evidence of effective

- implementation of controls.
- e. It has been appointed by the Board of Directors, Compliance Unit, as a key element to control the implementation, development and compliance with the plan to prevent the commission of crimes in Enerside.
 - f. We reviewed policies and procedures over financial reporting, so that the system has proven endowment funds that control spending Enerside to thereby prevent the circulating flow is destined for illicit activities.
 - g. It has also found the provision of financial resources and materials needed for proper and effective functioning of model criminal risk prevention.
 - h. The model is designed monitoring and tracking that allows Enerside:
 - Monitoring verification process controls with criminal risk coverage;
 - Monitoring changes in sub-processes, risks and controls;
 - Proposing improvements or, where applicable, of creating new controls to enhance the risk coverage.
 - i. It defined a process of analysis and reporting of breaches or violations of conduct, called Denunciation Channel, which allows Enerside know and react to possible illegal situations.
 - j. It has implemented the annual verification of model criminal risk prevention and eventual modification when reveal significant breaches of its provisions, or when changes in the organization, control structure or the activity that become necessary. However, this manual is a dynamic document, so that will be reviewed to incorporate, where appropriate, new preventive controls, areas of activity or entities that may join the Company.

3.3. Objectives of the Manual

- (16) The main objective of the Manual is to define the Model Risk Prevention Criminal implanted in Enerside, policies and rules of conduct and behaviour that regulate their activity and control systems in order to prevent the commission of offenses under the Penal Code.
- (17) To this end, the fundamental objectives of this Manual are as follows:
 - a. Optimize and facilitate continuous improvement of risk management system in the Company.
 - b. Establish a structured and organic prevention and control aimed at reducing the risk of committing crimes system.
 - c. Inform all staff Enerside the importance of compliance with the Model Criminal Risk Prevention and ethical principles contained in the internal regulations of Enerside.
 - d. Inform all employees Enerside a breach of the provisions contained in this manual involves the imposition of disciplinary measures and other interest groups acting on behalf, on behalf of, or otherwise, in the interest of the Company that the breach of the Manual may result in the termination of the relationship.
 - e. Expressly and public record of the categorical condemnation of Enerside to any kind of illegal behaviour, noting that, in addition to contravening the laws, contrary to the ethical

principles that are configured as core values of the Company to achieve their business goals.

- f. Adapt existing measures of processes control, so that allow Enerside prevent the commission of these offenses, and, if, despite the controls in the commission of a crime occurred, intervene immediately.
- g. Sensitize and train all employees Enerside on the importance of compliance and, especially, on criminal risk prevention.
- h. especially monitor controls introduced operations or processes capable of generating hypothetically risks criminal.
- i. Supervise the operation of the implemented system and this Manual with consequent periodic updating, either by organizational changes within Enerside or as a result of changes in the legislation.

4. Scope and Adoption Handbook by Enerside:

4.1. Scope of the Manual

- (18) This manual covers the analysis of (i) any criminal risks that may affect Enerside both as a result of the activity in Spanish territory and outside the territory when the Spanish courts have jurisdiction, as well as (ii) mitigating controls such risks.

4.2. persons subject

- (19) This Handbook members of the Board of Directors and all employees of Enerside (hereinafter, collectively, the "Employees applies¹").
- (20) Enerside promotes, in the field applicable to the child, the adoption of appropriate preventive measures for businesses and professionals that can outsource or collaborate.

5. Model elements of criminal risk prevention

- (21) Based on the work of revision and adjustments made as a result of the demands of the Penal Code, the Manual establishes the organizational model, prevention, management and control of criminal risks Enerside in Spain.

5.1. Policies, Procedures, and General Controls

- (22) The model criminal risk prevention Enerside structure of criminal risk prevention through:
 - a. General controls: basic risk control and have effectively to mitigate the generic risk of committing crimes (hereinafter "General Controls").
 - b. Specific Controls: specific measures aimed at mitigating a specific criminal risk or a

¹ The term "employees" is used to refer to all persons who may act under the authority of Enerside in the terms set out in Article 31a CP, whether an employment relationship and / or commercial. The meaning of the term "employees" may not be assimilated to other areas outside of this Manual.

group of specific criminal risks (hereinafter "Specific controls").

- (23) Controls on the Manual articulates allow the plan to prevent the commission of crimes of Enerside is a structured and organic prevention and effective for reducing the risk of offenses related to their activities monitoring system.
- (24) Model Criminal Risk Prevention Enerside is structured on Policies, procedures and controls listed below:
- a. Ethical Code: Enerside has a Code of Ethics for all employees who are required to know and comply with the standards of conduct contained therein. The Ethical Code states that employees must perform their role in the organization, not only in strict compliance with applicable laws, but also avoiding any practice that is not ethically acceptable under strict criteria of honesty and moral integrity. Failure to comply with the rules of the Code of Ethics will result in the application of appropriate sanctions in accordance with applicable law.
 - b. Financial Control: Enerside has a range of controls specific rules and principles designed to ensure the reliability of financial reporting, faithfully reflecting its economic, financial and equity situation in accordance with generally accepted accounting principles.
 - c. Security policy which aims to ensure proper treatment of confidential data and information or special character. As a result of the development of this policy Enerside additionally has other control activities in this area, as the role of Information Security or procedures associated with the protection of personal data.
 - d. Quality: Enerside have a policy of quality in the commitments and objectives of the Company are collected.

6. Financial Resources Management

6.1. Controls in the area of budget management and treasury

- (25) Enerside has several policies, procedures and controls relating to financial reporting and expense endow its system of total transparency.
- (26) In this regard, Enerside has a financial model with the following key features:
- a. Existence of Financial Management, whose purpose is to carry out the tasks of economic and financial management and the financial and accounting control.
 - b. Enerside performs external audits of annual accounts.
 - c. Within the Company there is limitation by powers available to the Company (buy, sell, exchange, assign, charge and any other title, acquire and dispose of all kinds of goods, make payments, provide guarantees, open and cancel current accounts, etc.) are pooled and are limited.
 - d. Existence of a budgetary control and monitoring based on expenditure control.
- (27) The said control and management systems also are useful to ensure proper management of financial resources in the terms required by the Penal Code. All this, to the extent that they ensure

the maintenance of books, records and accounts accurately and adequate internal accounting system and control in the financial field.

6.2. financial and material resources

- (28) Enerside has provided the Compliance Unit of the relevant financial and human resources necessary for proper and effective functioning of model criminal risk prevention, as described throughout this manual.
- (29) Enerside on an annual basis, provides in their budgets a specific item or prize for the proper and effective implementation of model prevention, criminal organization and management of risks.

7. Monitoring and Compliance Manual: control and monitoring bodies

- (30) Exercise due control required by the Criminal Code requires the introduction in the Company of continuous monitoring mechanisms, and the appointment of internal control bodies to monitor the implemented controls and possible criminal risks.
- (31) Enerside has defined a control structure consisting of (i) the Board of Directors, as maximum decision; and by (ii) Compliance Unit as monitoring and control organ.
- (32) The execution of the tasks of monitoring and control correspond to the Compliance Department as being delegated by the Board of Directors, being with autonomy and independence, in terms of both power control and the necessary initiative in this control framework.

7.1. Board of directors

- (33) It is the responsibility of the Board of management, administration and representation of society.
- (34) The Board of Directors of Enerside has attributed responsibility for performance of the general duty of supervision and control. In exercising this responsibility and, consistent with the values of the company, is responsible for approving the Model Criminal Risk Prevention.
- (35) At least annually, the Board of Directors of Enerside will be informed of monitoring and activity in relation to the model of criminal risk prevention.
- (36) Thus, the Board of Directors has entrusted the Compliance Unit the task of monitoring the functioning and observance of the Model criminal risk prevention, as well as updating.

7.2. Compliance Unit

- (37) necessarily composed of three members of the company, outside the Board of Directors and its functions, in order to prevent criminal risks, are as follows:

- a. Periodically review risk policies and propose the amendment and update to the Board.
- b. Monitor the effectiveness of internal control Enerside, as well as its risk management systems, including tax.
- c. Analyze the significant weaknesses of the internal control system.
- d. Supervising the preparation and presentation of financial information.
- e. Inform the Board of Directors regarding financial reporting.

(38) The implementation of the policy for the prevention of crimes of Enerside corresponds to the Compliance Unit has, among others, the following functions:

- a. Monitor performance, effectiveness and compliance with the plan for the prevention of crime.
- b. Promote a culture of prevention based on the principle of "zero tolerance" toward the commission of illegal acts and fraud situations and in applying the principles of ethical and responsible behaviour of all professionals Enerside, regardless of their rank and place to work.
- c. Analyze legislative changes and other developments that may affect Model criminal risk prevention.
- d. Check that the value system adopted in the Code of Ethics is updated, proposing updates and additions that may be necessary.
- e. Advice in resolving doubts arising in the implementation of codes and manuals.
- f. Receive, analyze and intervene in cases of complaints of employees.
- g. Ensure the dissemination of the principles of the Manual in the company.
- h. Promote the development and implementation of appropriate training programs.
- i. Comply with the sanctioning procedure and propose the application of appropriate disciplinary measures.
- j. Verify compliance with the sanctions to be applied in case of violations of ethical standards and compliance controls Model.
- k. Request additional reviews if deemed necessary.
- l. Check periodically, at least once a year, the prevention model, and propose possible modification when circumstances so require (evidence of non-operation, organizational changes, legislative changes, etc.)
- m. Collect annually from each area of the body a report on the progress of criminal risks, prevention measures and additional proposed.
- n. Report regularly to the Board of Enerside about the activity of the revised Manual activities, and the resources allocated that guarantee the realization of their work. Compliance Unit shall report its findings to the Board of Directors at least once a year.
- o. Make a work plan on monitoring Model criminal risk prevention.
- p. Adopt and / or coordinate the adoption of any measures it deems necessary to ensure compliance with the Manual and respond to the implementation and maintenance of procedures for systematic review of the Manual in order to provide the Board of Directors of Enerside reasonable assurance about monitoring, compliance and adequacy of this Manual.
- q. For this purpose, the Compliance is responsible, among others:
 - Develop an annual plan that contemplates the activities during the relevant period for the revision of this Manual.

- Identify new risk areas that can generate and track behaviours in the areas of risk.
- Keep track of the policies, procedures and controls set out in this Manual, and overall compliance of the same and the principles established in the Code of Conduct, through implementation of activities included in the Annual Plan.
- Communicate immediately and unequivocally the Board of Directors infringements of the Handbook be made manifest in conducting periodic reviews of the same shape.

(39) In order to ensure maximum effectiveness of their respective activities, the Compliance Unit has free access to all documentation that may be useful Enerside. In this regard, those responsible for any area or department are required to provide the Compliance Unit any information requested by them on the activities of area or department relating to the possible commission of a crime.

8. Monitoring Model criminal risk prevention

(40) The main objective of this section is to validate continuously implementing the Model for the Prevention of Criminal Risks Enerside, allowing periodically test its effectiveness as well as their evolution, allowing you to take the necessary actions to ensure their adequacy and effectiveness in development of their functions of prevention, management and control of criminal risks.

(41) Enerside has designed its Model criminal risk prevention based on risk management, involving different areas in the certification of processes and controls.

(42) The management of this model is the responsibility of the Compliance Department. The objectives that should govern the actions of the supervisory bodies are: (i) monitor the effectiveness of standards and control procedures established by Enerside to minimize the risk of unlawful behaviour by employees; and (ii) establish that Enerside has exercised due control over their business, thus fulfilling the requirement under the Penal Code.

8.1. Model structure monitoring and control

(43) The monitoring and verification function of criminal risks Enerside is articulated according to the following chart:

8.1.1.- Monitoring process model

(44) The monitoring process Model criminal risk prevention is done continuously over time and therefore is configured as a process in which a situation on a regular or continuous observed.

(45) Model criminal risk prevention should be evaluated regularly by those responsible for the controls and supervised by the supervisory body, at least once a year to ensure their suitability, adequacy and effectiveness.

8.1.2.- Control process model

- (46) The control process, also called infringement procedure, is the establishment of corrective and / or disciplinary action for breach of the general principles set out in the Manual of criminal risk prevention actions.
- (47) Such disciplinary proceedings can be captured in a reference to the current labour legislation applicable to workers Enerside or the development of a specific disciplinary proceedings for violations that take place.
- (48) The imposition of disciplinary sanctions by the Board of Directors on the proposal of the Compliance Unit.
- (49) In the event of a breach of the Code of Ethics or this Manual is detected, the Compliance Department will act immediately, informing the Board of Directors after deliberation and approval, as appropriate, will initiate appropriate administrative or judicial proceedings in each case.
- (50) Under no circumstances may justify the commission of a crime with obtaining a benefit for the Company. From Enerside any income or direct or indirect benefit that can be perceived as a result of criminal action by any of its employees is rejected.

8.2. *Dissemination and training*

- (51) The implementation of control measures in this manual should be accompanied by appropriate dissemination of himself and his explanation Enerside employees.
- (52) the importance of compliance and acceptance and complicity by workers Enerside is emphasized.
- (53) To this end, Enerside adopted the following measures for dissemination and training:
 - a. Enerside provides specialized on the code of conduct, both from a general point of view, as a specialist at the request of any interested training.
 - b. The distribution of this Manual is the responsibility of the Compliance Department, which must emphasize the importance of compliance and the assumption of the principles representing both the Ethical Code and this Handbook.
- (54) Attending training courses on the prevention of criminal risks are concluded, is required employees must leave a written record of their attendance and conduct an evaluation test of acquired knowledge.

8.3. *Whistle-blower Channel*

- (55) creating a mailbox anonymous allegation in the internal system of the company are available so that all workers can perform secure communication with the Compliance Department to report possible illegal or irregularities that may be committed within the company.

8.4. *Archive and documentation*

- (56) Model Risk Prevention Criminal generates evidence that allow the development, monitoring and supervision of the model itself and prove that this prevention model is operational and in a process

of continuous improvement.

- (57) Consequently, Enerside identifies, standardizes and ensures custody of the key evidence showing the effective implementation of controls designed.
- (58) All documentation generated in the Model criminal risk prevention is retained for a minimum period of 5 years.

9. Approval of the General Part of Criminal Prevention Manual Risks

- (59) This general part Manual has been approved by the Board of Directors of Enerside, SA as of June 17, 2019.

II SPECIAL PART

1. Determination of potential criminal conduct

(60) In this paragraph offenses, except for error or inadvertent omission, Enerside can commit directly or indirectly through their workers relate:

	type of crime
one	Con (Arts 248 -. 251.bis CP)
2	Fraud (Articles 436 -. 438 CP)
3	Punishable bankruptcy (Arts 257 -. 261.bis CP)
4	Damage (Arts 263 -. 267 CP)
5	Intellectual Property and consumers (Articles 270 -. 286.quarter CP)
6	Laundering (Arts 301 -. 304 CP)
7	Public Finance and Social Security (Arts 305 -. 310.bis CP)
8	Construction, building or illegal urbanization (Arts 319 -. 320 CP)
9	Cybercrime (Arts. 197.bis and 270 et seq. CP)
10	Environment (Arts 325 -. 331 CP)
eleven	False means of payment, currency and ringing effects (Arts 386 -. 403 CP)
12	Forgery (Arts. 395 and 396 CP)
13	Public health (Arts 359 -. 378 CP)
14	Bribing (Arts 419 -. 427.bis CP)
fifteen	Traffic influences (Arts 428 -. 431 CP)
16	Criminal Organization or Group (Arts 570.bis -. 570.quarter CP)
17	Financing of Political Parties (Arts. 304.bis and 304.ter CP)

2. Description and Risk Assessment commission of potential criminal conduct

(61) In connection with the provisions of the preceding paragraph, then a description of potentially criminal acts Enerside can reach undertake, directly or indirectly, as well as an assessment of the possibility that this risk materializes is listed:

	Description of Risk	Risk Assessment (%)
one	<ul style="list-style-type: none"> - Deceive a third party for profit, to perform acts of disposal. - Disposal of assets owned others. - contractual simulation. 	60
2	<ul style="list-style-type: none"> - Bribe a public official to act on behalf of third party against the Public Administration. - Paying concepts not due to public officials in exchange for favours. 	80
3	<ul style="list-style-type: none"> - Dispose of company assets to avoid solvent. 	30
4	<ul style="list-style-type: none"> - Destruction of private property. 	25
5	<ul style="list-style-type: none"> - Infringement of intellectual / industrial property. - Disclosure of business secrets. - Billing necessities that impact on consumers. - Alteration of raw materials prices or violence, threat or deception. - Distort the price of raw materials from inside information. 	70
6	<ul style="list-style-type: none"> - Disguise the origin of illicit money or not declared in the procedure declaration thereof. 	10
7	<ul style="list-style-type: none"> - Evade Social Security contributions. - Evading taxes dues to the Treasury. - Alter or distort conditions or requirements for the application of reductions or getting grants. 	70
8	<ul style="list-style-type: none"> - Urbanize, build or build when it is not, nor will legalized. 	80
9	<ul style="list-style-type: none"> - Access to computer systems. - illegal interception of computer data. - Interference or abuse in the use of computer data. 	35
10	<ul style="list-style-type: none"> - Actions contrary to the provisions of environmental regulations and has caused or may have caused, damage to the environment or people's health. - Pollution structural components or liquid. 	80
eleven	<ul style="list-style-type: none"> - Or use counterfeit currency, knowingly false currency. - Fake paper money or stamped paper or use consciously, those who are false. 	10
12	<ul style="list-style-type: none"> - Falsifying private documents to the detriment of a third party. 	80
13	<ul style="list-style-type: none"> - Use of chemicals. 	80

	<ul style="list-style-type: none"> - Water pollution elements for use or human or animal consumption. - Consumption and / or drug trafficking 	
14	<ul style="list-style-type: none"> - Bribing public official 	80
fifteen	<ul style="list-style-type: none"> - Sale or marketing information for corporate profits 	90
16	<ul style="list-style-type: none"> - Conducting criminal activities for 2 or more people 	80
17	<ul style="list-style-type: none"> - Payments to political parties in order to obtain legal or procedural favours 	80

3. Measures to mitigate the risk of commission of criminal behaviour

(62) Finally, then it relates a series of measures in order to mitigate the possibility that those criminal acts are committed:

	Measures for Risk Mitigation	Responsible department
one	<ul style="list-style-type: none"> - Perform control over the content of the Companies Registry to prevent malfunctions in the process of sale. - Conduct research on the apparent headlines and, where appropriate, on the real holders. 	<ul style="list-style-type: none"> - Legal department
2	<ul style="list-style-type: none"> - Monitoring all steps, they are performed in an administrative process. - financial control of company resources. 	<ul style="list-style-type: none"> - Financial Department. - Business Development.
3	<ul style="list-style-type: none"> - Perform regular on company assets control to prevent uncontrolled provisions. 	<ul style="list-style-type: none"> - Legal department. - Financial Department.
4	<ul style="list-style-type: none"> - Follow standard operating procedures in construction to avoid causing any damage. - Have the corresponding liability policies to cover damages that could produce. 	<ul style="list-style-type: none"> - Business Development. - Financial Department.
5	<ul style="list-style-type: none"> - Check with the Patent Office and Trademark rights of each party in each transaction. - Control the acquisition of products or raw materials for the procedure conforms with the Ethical Code and in accordance with Spanish law in general. 	<ul style="list-style-type: none"> - Legal department. - Technical Department. - Operations Department. - Financial Department.
6	<ul style="list-style-type: none"> - Always operate by bank transfer, since banks also perform control over money laundering 	<ul style="list-style-type: none"> - Financial Department. - Business Development.

7	<ul style="list-style-type: none"> - Should do these tasks in-house: double check with the Finance Department. If outsource the service, periodically they check the corresponding payments are made. 	<ul style="list-style-type: none"> - Financial Department. - Legal department.
8	<ul style="list-style-type: none"> - Check the status of the land and their grades according to the provisions in the Land Registry. 	<ul style="list-style-type: none"> - Business Development. - Legal department.
9	<ul style="list-style-type: none"> - controlled access, identifying person, date and time, the storage systems company. 	<ul style="list-style-type: none"> - Technical Department.
10	<ul style="list-style-type: none"> - Acting in accordance with environmental regulations. - Meet the requirements and conditions resulting from environmental administrative authorizations or corresponding. - Having a control program, if any, for the treatment of toxic and / or polluting products. 	<ul style="list-style-type: none"> - Business Development. - Operations department. - Technical Department. - Legal department.
eleven	<ul style="list-style-type: none"> - Used exclusively by electronic payment methods bank payment services. 	<ul style="list-style-type: none"> - Financial Department.
12	<ul style="list-style-type: none"> - Perform a check on the official documents certified by the company. 	<ul style="list-style-type: none"> - Legal department.
13	<ul style="list-style-type: none"> - Applying a protocol handling and use of toxic elements and / contaminants. - The site manager must control situations so that no consumption or drug trafficking between personnel work. 	<ul style="list-style-type: none"> - Operations department. - Technical Department.
14	<ul style="list-style-type: none"> - Strict control (dual control) on key accounts and banking company. 	<ul style="list-style-type: none"> - Finance Department
fifteen	<ul style="list-style-type: none"> - Strict control (dual control) on key accounts and banking company. 	<ul style="list-style-type: none"> - Finance Department
16	<ul style="list-style-type: none"> - Internalization / Job training on the Code of Ethics of the company and the Manual of criminal risk prevention. 	<ul style="list-style-type: none"> - All the departments.
17	<ul style="list-style-type: none"> - Strict control (dual control) on key accounts and banking company. 	<ul style="list-style-type: none"> - Finance Department

ATTACHMENTS

1. Ethical code

2. Disciplinary code