

The present policy includes the commitment in the fight against bribery, **which** is totally prohibited, and the outright opposition to the commission of illegal or irregular acts and the firm will to combat and prevent them complying with the principle of "zero tolerance".

RECUPERADORA DEL CABLE Y GESTION DE RESIDUOS, S.L. (**REDELCA**) follows this by the word and the spirit of the obligations and rules of the different jurisdictions in which it operates.

This policy is appropriate for our company (recovery of non-ferrous waste, recycling of cables, marketing of non-ferrous metals) and is applicable to all employees, managers and administrators of **REDELCA**

**The following commitments are established:**

- Inform all interested parties, in a regular, timely and reliable way, about this policy, as well as its systems for the identification, management and control of risk in this area.
- Generate an environment of transparency, raising concerns in good faith or on the basis of a reasonable belief, in confidence and without fear of reprisals, and integrating the different processes defined in **REDELCA** for the prevention of crimes. Maintain adequate communication channels to meet the requirements of an anti-bribery system and encourage the communication of possible irregularities.
- Establish elements of internal control, including financial and accounting, to prevent and, where appropriate, detect and eradicate irregular practices related to bribery.
- Communicate to employees, suppliers, subcontractors and those with whom they collaborate or who act on their behalf, the duty to inform any fact constituting a crime, fraud or irregularity through the established communication channels.
- Ensure the due diligence of **REDELCA** in the prevention, control, reporting and reparation of the crimes imputed to it.
- Expressively support and collaborate with public and private efforts and initiatives aimed at combating fraud, corruption and bribery. In particular, provide all assistance and cooperation necessary for the investigation of allegedly criminal, fraudulent or other irregular ways that may have been committed by their professionals.
- Commit to the continuous improvement of our anti-bribery system and periodically update this policy to ensure that it collects recommendations and best practices.
- Extend the commitments to the supply chain of **REDELCA**, informing of its position and expectations in this area.
- Assign responsibility for establishing action plans, objectives and monitoring indicators to those responsible for the company.
- Establish mechanisms and ensure compliance with internal and external regulations applicable both by the company's personnel and, where appropriate, by third parties related to it.

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- Not resorting to third parties such as agents or other intermediaries, consultants, representatives, suppliers or associates to bring undue benefits, monetary or otherwise, to public employees or their business partners or family members or associates thereof.
  - Failure to comply with this anti-bribery policy will result in the corresponding labor sanction and possible criminal liability depending on the crime allegedly committed.

The Company