

CERTIFICATE 2026

ANTI BRIBERY



SETRAM (from now on, “the Company”) has incorporated an ethical behavior and corporate responsibility program in terms of anti-corruption with the following scope and services:

1 ANTI BRIBERY CODES AND POLICIES

Development of policies, procedures and standards for the prevention and control of corruption, among others, in the following areas:

ANTI BRIBERY CORPORATE POLICY

General and specific National and International Anti-Corruption Principles and guidelines for Gifts / Hospitality / Travel and Hospitality Expenses / Facilitation Payments / Donations / Sponsorships / Contributions / Policies / Intermediaries and Agents / Advisors / Business Partners. Follow-ups and control procedures.

2 ANTI BRIBERY DUTY DOCUMENTS AND STATEMENTS

Communication plan to employees and relevant third parties on their anti-corruption duty and the codes and policies in relation to this topic.

3 INTERNAL INFORMATION SYSTEM

Internal Information System and Internal Information Channels with the requirements of Compliance and elements of independence, confidentiality, registration, communication and protection/attention of the informant and those involved. Protocols and mechanisms for action, follow-up and reporting..

4 TRAINING

General training program for employees and specific training program in terms of anti-corruption for Managers and Directors of risk areas.

5 EXTERNAL EXPERT SUPPORT

Access to a specialized external expert in the event of incidents, complaints or requirements of independence and expertise.

6 INTERNAL RESPONSIBLE PERSON

Appointment of an internal responsible person with training and support in terms of anti-corruption for the supervision of the proper application of related internal Codes and Policies.

7 MONITORING AND UPDATE

Annual Supervision and Control Plan for the proper implementation, follow-up and update of the Compliance Program.

Certified and audited by:

BONET

Registration Code
IOE25032600002ENG

Validity year: 2026