



ELITE CONSTRUCCIONES S.L.

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COMPLIANCE TRAINING PROGRAM FOR ANTI-BRIBERY AND CORRUPTION

INTRODUCTION

Corruption is becoming a priority not only for government, but for the private sector and other actors in society, since in recent years the continuing abuses and scandals of fraud, embezzlement, bribery, extortion, double accounting, have broken the trust of investors, foreign governments, customers and society in general. This phenomenon is a serious problem that impairs the values and principles that govern a society and becomes, not only an obstacle to the economic, social, political development of countries, but also a threat to economic growth and organizations' reputation.

This problem is not only a priority at the local level, but has become an issue of interest to the international community; that is why several international organizations, such as Transparency International, the International Chamber of Commerce or the United Nations Global Compact, provide tools for both private and public organizations to combat corruption. The Global Compact, in its tenth principle, enacts the fight against corruption, while mentioning that corruption must be managed in three dimensions: internal, external and collective. Added to this is the commitment and unification of efforts by three actors: The Government, business and civil society, who share co-responsibility in the prevention and eradication of corruption.

One of the fundamental commitments of Elite Construcciones S.L. is to prevent, fight and eradicate corruption and bribery, ensuring that those acting on behalf and representation of our company do so with effective policies against these scourges, because one of our great principles is transparency in management. Accordingly, when we hire third parties, such as agents, distributors or joint venture partners, we express our healthy obligation to complete due diligence at the time of considering agreements to ensure that they do not exercise away from all procedures not in accordance with the Act, and of periodically monitoring its performance to ensure continuous compliance.

This guide is intended to serve as a national reference for the construction, implementation, monitoring and evaluation of Anti-Corruption Compliance Program by the national private sector, which trade relations throughout Equatorial Guinea.

With this we seek to foster relationships of trust in the interaction between companies and also with the Government; fostering the culture of legality, transparency and business integrity; make a contribution to the competitiveness and productivity strategy and contribute to the fulfilment of the requirements contemplated in this program.

Compliance Program is now a vital asset in the portfolio of robust anti-corruption practices. While the design and implementation of these programs does not guarantee the elimination of bad practices, it is publicly recognized that companies that incorporate anti-corruption policies and procedures in an integrated way in their management are less vulnerable to possible acts of corruption and bribery and are less exposed to losses arising from occupational fraud including acts of corruption. In fact, they are companies that can most effectively mitigate the risk of corruption and have information necessary to account for the interests of investors, the media, civil society organizations, regulators and others interest groups.



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With this Plan, our company has an instrument that allows us to know the guidelines or guidelines that are suggested, having to define at all times, define the general contents of our policies and Compliance Programs in Anti-Corruption, identification of the reasons why its design and implementation is important.

Failure to comply with this policy, whether intentional or unintentional, may result in disciplinary action such as dismissal, without ruling out the possibility of taking criminal action against those who have committed these criminal wrongs.

This anti-corruption and bribery policy establishes Elite policies to combat and prevent acts of bribery and corruption. These policies and procedures are designed to comply with legislation regulating bribery and corruption, both nationally and internationally.

This policy provides guidance on the standards of behaviour that we should all join and most of them reflect the common sense and good business practices in which we work in any case. This policy is designed to help you identify when something is prohibited to prevent bribery and corruption and provide you with help and guidance.

The fundamental standards of integrity under which we operate do not vary depending on where we work or who we deal with. This policy applies to all civil servants, employees (full-time and part-time) and temporary construction workers, referred to as employees in this document, throughout the group, no matter where they are or what they do. It is the responsibility of each of us to ensure that we meet these standards in our daily working lives. This policy sets a single standard that all employees must meet.

Closing spaces to corruption is therefore an obligation of all Elite Construcciones S.L. employees committed to building a society clean of these anomalous behaviours. In this sense, the private sector must play a role of the greatest importance in this shared national and international purpose. Implementing mechanisms to prevent, detect and report on acts of corruption, to help combat this scourge.

Elite Construcciones S.L., committed to this cause and having as its axis one of its guiding principles such as transparency, cannot be left out in the fight, prevention and eradication of bribery and corruption, for this reason, we will continue to take strategic measures such as training our staff at all levels, organizing seminars, courses and workshops to have a staff with sufficient information in this area and who respond to non-remedial requirements only from our partners but also to respond to the current demands in the fight against these scourges.

In this sense, Elite Construcciones S.L. organizes annual training and training courses for its staff, distributed in eleven sessions, that is, for eleven months from January to November, and in each session it is made up of fifty employees, since, Elite currently has a quota of approximately five hundred employees, these courses will consist of four thematic blocks, nuanced that all modules will be homogeneous for all sessions broken down as follows:

1.- OBJECTIVE

2.- Why Implement a Business Program for Compliance Against Corruption

2.1. Mitigation of Reputational Risks Related to Corruption and Bribery



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2.2. Competitiveness and Investment Attraction

2.3. Compliance and Sustainability

2.4. Compliance and Our Partners

2.5. Compliance as a Qualifying Circumstance.

2.6 Complications and Impact

3.- How to Implement an Enterprise Anti-Corruption Compliance Program

3.1.- Analysing the Preliminary Aspects to be Taken into Account

3.1.1. International Regulatory Framework

3.1.2. National Regulatory Framework

3.1.3. Accepted Standards and Guidelines

3.1.3.1. Internal Controls - Integrated Framework

3.1.3.2. Federal Guidelines, here we will refer to the UK Bribery Act 2010, U.S. Foreign Corrupt Practices Act (FCPA), UN Global Compact (including anti-bribery)

3.2. Program Planning Phase

3.2.1. Resources

3.2.2. Risk Identification and Assessment

3.2.2.1. Method of Identification and Risk Assessment

3.2.2.2. Documentation of Results

3.2.2.2.1. Risk Register

3.2.2.2.2. Creation of a Monitoring and Monitoring Tool

3.3. Design, Construction and Implementation Phase of the Program

3.3.1. Construction of the Anti-Corruption Policy

3.3.2. Construction of Internal Mechanisms

3.3.3. Communication and Training

3.3.4. Communication Plan

3.3.5. Report and Consultation



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- 3.3.6. Organization and Responsibilities
 - 3.3.7. Adopt Policies for Particular Risk Areas
 - 3.2.8. Contributions for the Financing of Political Campaigns
 - 3.3.9. Develop Guidelines for Charitable Donations and Compensation Commitments
 - 3.3.10. Include Anti-Corruption Practices in the Rules Related to Employee Travel, Gifts, Hospitality and Entertainment
 - 3.3.11. Prohibit Facilitation Payments
 - 3.3.12. Conflicts of Interest and Periodic Statements
 - 3.3.13. Business Relations, Third Parties and Business Partners
 - 3.3.14. Implement Internal Controls Accounting Records
 - 3.3.15. Human Resources
 - 3.3.16. Review and Monitoring of the Program
 - 3.3.17. Collective Actions
 - 3.3.18. Use an Anti-Corruption Compliance Certification Program
 - 3.4. Periodic Risk Assessment and Program Modification Phase

4.- CONCLUSIONS.

FACILITATOR and RESPONSIBLE FOR COMPLIANCE

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