

ANTI-CORRUPTION POLICY

Aware that corruption can seriously damage the economy, sustainable development and the effectiveness of national and international trade, ANA considers it unacceptable and has established this Anti-Corruption Policy.

ANA manages its activities with respect for ethical principles based on rules of conduct aimed at behaviour based on the transparency and integrity of its employees and prioritising the commitment to act proactively in the prevention of corruption and related infractions.

To this end, ANA has implemented the General Framework for the Prevention of Corruption as part of a Programme for Integrity, Transparency and Compliance, which allows it to prevent corruption and reinforce its protection against it through the following mechanisms:

1. Plan for the Prevention of Corruption Risks and Related Infractions;
2. Internal Control System;
3. Charter of Ethics & Conduct and Anti-Corruption Code of Conduct;
4. Reporting Channel;
5. Training Programme;
6. Procedure for Assessment of Corruption Risk in Third Parties;
7. Programme Assessment System

ANA has also appointed an Ethics and Vigilance Committee transversal to its entire organisational structure in order to put this programme into operation and to monitor it, ensuring not only compliance with the law and regulations, but also alignment with the regulations in force for the VINCI Group.