

CORPORATE COMPLIANCE AND ANTI-BRIBERY POLICY

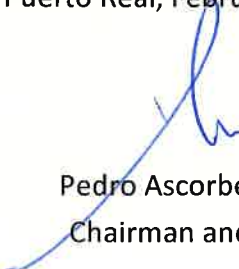
DRAGADOS OFFSHORE, S.A., whose business activity scope is:

Design, purchase, construction, installation, repair, assembly, commissioning and maintenance of fixed offshore platforms, offshore floating platforms, offshore wind energy, underwater systems and shallow water pipelines, modular onshore manufacturing, and special projects based on large structures of steel, assumes the commitment to improve its management through the implementation of a Criminal and Anti-bribery Compliance Management System in accordance with the UNE 19601 (2017) and ISO 37001 (2016) regulations, respectively, in order to enhance its Business Ethics culture, and that this is an integral and permanent part of all its business processes. This will enable to strengthen the sustainability of the organization and minimize or control the impact of the risks associated with the potential breach of established obligations.

In order to guarantee it, the Senior Management of DRAGADOS OFFSHORE, S.A. takes the decision to implement the following actions:

- √ Define, elaborate, communicate and implement a Corporate Compliance Program that includes a Crime Prevention Plan, which guarantees to all levels of the Organization that the activities are carried out in accordance with the applicable legal requirements and according to the guidelines determined by DRAGADOS OFFSHORE, SA.
- √ Comply and ensure strict compliance with current legislation, considering what is defined in the current Penal Code, through the establishment of a Corporate Compliance Program that expressly prohibits and at all times the commission of criminal acts and corrupt behavior, bribery and, in general, inappropriate or non-accepted practices.
- √ Promote the implementation and adherence to codes of conduct or good practice criteria for all its personnel or those who work on its behalf.
- √ Appoint an Internal Corporate Compliance Responsible in accordance with the principles of independence with the capacity and authority to supervise, monitor and control the effective implementation of the Corporate Compliance Program and anti-bribery protocols
- √ Identify and evaluate criminal risks in order to minimize them through objectives, action plans and procedures.
- √ Continuously improve the performance of the Criminal Enforcement and Anti- bribery Management System.
- √ Ensure that this Policy is communicated and understood by all the staff of DRAGADOS OFFSHORE, S.A. by circulating it; keeping it available to all interested parties in general.
- √ Communicate the obligation to report suspicious acts or conducts related to criminal, corrupt or bribery risks, for the mutual benefit of all the parties that comprise the organization, guaranteeing the anonymity of the informant.
- √ Have a sanction procedure for its application in case of non-compliance with the principles established in this Compliance Policy

Puerto Real, February 2019



Pedro Ascorbe Trian
Chairman and CEO