



SITRASA®

al servicio del medio ambiente

Sistemas de Tratamiento Ambiental S.A. de C.V.

ANTI-CORRUPTION POLICY



OBJECTIVE

At sitrasa, we carry out business practices based on compliance with the law; Likewise, we are committed to carrying out our activities in accordance with values such as legality, integrity, loyalty, respect, honesty, trustworthiness and responsibility.

Likewise, we have the commitment that any activity we carry out has a support based on the values that characterize us; condemning in this way the corruption, bribery, fraud or any other illegal act that could originate, derived from the provision of our services.

The particular objective of this Policy is to establish guidelines and obligations to prevent and combat any type of act of corruption.

DEFINITIONS

Acts of corruption: Based on the Inter-American Convention against Corruption:

- a) The request or acceptance, directly or indirectly, by a public official or a person who exercises public functions, of any object of pecuniary value or other benefits such as gifts, favors, promises or advantages for himself or for another person or entity in exchange for the performance or omission of any act in the exercise of their public functions;
 - b) The offering or granting, directly or indirectly, to a public official or to a person who exercises public functions, of any object of pecuniary value or other benefits such as gifts, favors, promises or advantages for that public official or for another person or entity in exchange for the performance or omission of any act in the exercise of their public functions;
 - c) The performance by a public official or a person who exercises public functions of any act or omission in the exercise of their functions, in order to illicitly obtain benefits for themselves or for a third party;
 - d) The malicious use or concealment of assets resulting from any of the acts referred to in this article;
- or business for a particular company or secure any other Improper Advantage to achieve it.



e) Participation as author, co-author, instigator, accomplice, accessory or in any other way in the commission, attempted commission, association or conspiracy to commit any of the acts referred to in this article.

Collaborator: Any SITRASA worker.

Conflict of Interest: When directly or indirectly the personal interests of the Collaborators or their Family Members have a real, potential or apparent influence on the decision-making of operations or negotiations.

Corruption: It is an act through which a person is driven to act differently from the normative standards of the system to favor particular interests in exchange for a reward.

Public Official: Is a State servant, designated by provision of the Law, by popular election or by appointment of a competent authority, to occupy higher levels of the organizational structure and to assume functions of representation, initiative, decision and command.

Gratuity: Also called a "gift", includes any payment made in cash, in kind or by discount, such as a Bribe to obtain an Improper Advantage.

Bribery: It is offering, promising or giving, as well as demanding or accepting, any Improper Advantage or gain, whether directly or indirectly, to obtain, retain or carry out business for a particular company or secure any other Improper Advantage to achieve it.

COMMITMENTS

- 1.- Comply with international laws and conventions on combating corruption.
- 2.- Comply with all financial information regulations applicable to SITRASA, since the falsification of our accounting books and records is strictly prohibited and constitutes a crime.
- 3.- Reject and refrain from offering any type of bribe or gift to any authority or person with whom you have a business deal.
- 4.- The obtaining of authorizations, permits, licenses or any procedure required for the provision of services, will be processed directly by the Collaborators or through Managers authorized by SITRASA, forcing us to carry out the procedures in a lawful, ethical and in accordance manner. with the regulations that regulate it.
- 5.- Zero tolerance against acts of corruption, committing ourselves to communicate and report, if necessary, before the corresponding authorities those cases in which an employee or third party incurs in an act of corruption.
- 6.- Enter contracts in which we establish anti-corruption clauses to prohibit acts of corruption and illegal practices, as well as demand compliance with all laws applicable to our clients.