

China Three Gorges Latam

# COMPLIANCE AND ANTI-BRIBERY POLICY

CTGL-LC-PO-008

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## Chapter 1. General provisions

### 1. Objective

Establish guidelines for the prevention, detection, and management of bribery risks. This set of measures is based on the Anti-Bribery and Compliance Management System that China Three Gorges Latam (CTG Latam) has decided to implement.

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Its purpose is to create a conducive environment for the prevention, detection, and early management of compliance and bribery risks, as well as to mitigate adverse effects should they materialize.

Additionally, it aims to promote a culture of compliance and antibribery among all stakeholders, so that each one can reflect these principles in their daily conduct.

## 2. Scope

This policy applies to all company employees, clients, suppliers, contractors, and, in general, to all stakeholders with whom a commercial, contractual, or cooperative relationship is established, either directly or indirectly.

## 3. Responsibilities

### 3.1 Executive committee

- Ensure compliance with this policy, oversee its implementation, and foster an organizational culture based on ethics.
- Allocate the necessary resources for the development and continuous improvement of the anti-bribery management system.
- Provide an environment that promotes transparency and accountability.
- Approve the compliance and anti-bribery policy and objectives, ensuring they are compatible with the company's strategy.
- Designate or nominate the compliance and anti-bribery function within the company.

### 3.2 Country Manager

- Ensure the integration of compliance and anti-bribery management system requirements into the company's processes
- Ensure that the compliance and anti-bribery management system achieves its intended outcomes.
- Promote continuous improvement.
- Support leadership roles within the company in accordance with the compliance and anti-bribery management system responsibilities.
- Uphold the company's values.
- Ensure timely communication of compliance and anti-bribery matters, including non-compliance cases, and ensure that appropriate actions are taken.

### 3.3 Department Director

- Identify compliance obligations and anti-bribery risks that may arise from the process.
- Promote an ethical and compliance-oriented culture through leading by example and demonstrating commitment to compliance
- Implement and verify due diligence with third parties.
- Ensure compliance with the anti-bribery and compliance policy within their department.

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### 3.4 Compliance officer

- Evaluate the Compliance and Anti-Bribery System in coordination with department Directors.
- Facilitate reporting mechanisms for suspicious activities, breaches of internal controls, incidents, and non-compliance with legal requirements.
- Investigate reports of corruption, bribery, and non-compliance.
- Supervise and monitor activities to prevent corruption, bribery, and non-compliance.
- Verify compliance with the policy at planned intervals

### 3.5 Employees

- Identify compliance and anti-bribery risk events.
- Comply with compliance and anti-bribery policies.
- Adhere to applicable regulations relevant to their role and responsibilities.
- Report any suspicious activity.
- Avoid conflicts of interest or unethical practices.
- Cooperate in investigations.
- Attend mandatory training sessions.

## Chapter 2 Principles

The Anti-Bribery and Compliance policy establishes that activities must be carried out under the following principles, which must be integrated into actions taken on behalf of the company at all levels and aligned with the guiding principles in the code of ethics:

- **Integrity:** Act honestly, legitimately, transparently, and consistently with both thought and action, in line with the framework of laws, company policies, and current legal regulations.
- **Transparency:** Sincerity in actions, thoughts, and words; clear conduct, and a willingness to subject one's actions to clear norms and rules.
- **Honesty:** Awareness of responsibilities and moral, legal, and professional obligations, and practicing them accordingly.
- **Compliance:** Adhering to procedures, policies, and regulations is a key part of discussions on integrity and ethics. Moreover, ensuring that compliance management is integrated into all company processes, guaranteeing that business activities meet the established controls and procedures.
- **Prevention:** Promote a preventive and proactive approach among all employees, raising their awareness of compliance and contributing to the development of an ethical business environment.
- **Applicability:** Compliance management will be realistic regarding the business context, region, and organizational structure, balancing cost and efficiency, and adapting to changes in both internal and external environments.
- **Objectivity and Independence:** Compliance and anti-bribery management will be carried out objectively, and the compliance officer will operate independently, with the right to investigate and access necessary information.

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## Chapter 3 Policy

### 1. Purpose and Commitment

China Three Gorges Latam (CTG Latam) is committed to combating bribery and corruption in all its forms. This policy establishes the principles and guidelines that all employees, executives, business partners, and third parties must follow to ensure that company activities are conducted ethically, transparently, and in compliance with applicable regulations.

### 2. Guidelines

CTG Latam strictly prohibits any form of Unethical behaviour, bribery and corruption, whether direct or indirect, with the intent to unduly influence decisions, including:

#### 2.1 Bribery of Public Officials

Any attempt to influence an official through payments, gifts, favours, or promises.

#### 2.2 Private Bribery

Undue payments or incentives to private parties to secure commercial advantages.

#### 2.3 Facilitation Payments

Payments to expedite routine procedures or secure services are not permitted

#### 2.4 Gifts and Hospitality

Gifts and hospitality may be offered to stakeholders, provided they are reasonable, transparent, not perceived as an attempt at bribery, and approved by the executive committee. They must not be intended to exert undue influence on any interested party or influence actions or decisions in favor of the company.

No CTG Latam employee is permitted to receive gifts from any supplier, contractor, or stakeholder.

#### 2.5 Zero Tolerance

CTG Latam adopts a zero-tolerance approach to issues related to bribery and corruption.

#### 2.6 Protection for Whistleblowers

Any employee, client, supplier, or contractor of the company who, in good faith, reports a violation of this policy, suspicious activities, or any act of corruption or bribery will be protected against any form of retaliation.

#### 2.7 Transparency in Financial Records

Employees, executives, and contractors acting on behalf of CTG Latam are prohibited from engaging in conduct that conceals, alters, omits, or misrepresents financial records to hide inappropriate activities.

#### 2.8 Donations and Sponsorships

The company will strictly adhere to applicable local regulations as well as internal policies. CTG Latam will not engage in political donations, public or private decision-making, or illegal activities.

External sponsorships require executive committee approval, including sponsorship details, scope, and relevant information specifying compliance obligations.

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## 2.9 Contracts

All contracts or agreements between the company and third parties must include anti-bribery and anti-corruption clauses, declarations, or guarantees. These must state and ensure compliance with this policy, applicable anti-corruption laws, and regulations. The right to terminate the contract in case of a breach of this policy or any applicable anti-corruption law or regulation should also be included.

## 2.10 Entertainment

Entertainment, courtesy, and hospitality acts are permitted as long as they comply with policy CTGL-FI-PO-001 “Expense Management” and have executive committee approval

## 2.11 Conflict of Interest

Employees will ensure that all decisions made within their duties are in the company's best interest. Conflicts of interest must be reported to the compliance officer to guarantee sound judgment and decision-making within their roles.

## Chapter 4 Communication

Established communication channels in document CTGL-LC-PR-001 “Bribery Investigation Procedure” allow employees and stakeholders to report any suspicion of bribery without fear of retaliation. This report can be made anonymously or directly through the following channels:

- Email: [Compliance.officer@ctglatam.com](mailto:Compliance.officer@ctglatam.com)
- Website.: [www.ctglatam.com](http://www.ctglatam.com)

## Chapter 5 Training

All employees will receive training on anti-bribery policy, bribery-associated risks, and procedures for reporting inappropriate conduct, both during onboarding and periodically. Training programs will align with best practices, ensuring all staff is prepared to face ethical dilemmas and report any suspicious incidents.

## Chapter 6 Continuous improvement

CTG Latam anti-bribery management system will be periodically reviewed, with ongoing improvements sought through opportunities for enhancement and internal and external audits. Lessons learned and recommendations will be implemented to strengthen the policy and ensure its long-term effectiveness.

## Chapter 7 Sanctions

Employees who do not comply with the policy may be subject to disciplinary actions and sanctions as specified in the company’s Internal Work Regulations and methodology implemented in procedure CTGL-AD-HR-PR-001 “Disciplinary Measures Procedure.”

In the event of control violations by business associates, due diligence will be initiated according to the contracts signed between the company and its client, supplier, or contractor.

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## Chapter 8 Supplementary provisions

This policy has been reviewed by the Legal Department and approved by the Executive Committee (ECM).

Any modifications to the policy will be reviewed again by the departments involved and the executive committee (ECM).

This policy will be communicated to all company employees and stakeholders.