

CORPORATE ENVIRONMENT POLICY VICINAY, S.A.





**Development of Chapter IV. Responsibility in Management.
Section 1) We exercise our commitment to the environment, the Code of Ethics**

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1. INTRODUCTION

1.1. About us

1. **VICINAY S.A.** (hereinafter, “**VICINAY**”) is the leading entity of **VICINAY GROUP**, which carries out its activity through its subsidiaries, mainly in the sectors of manufacturing anchoring equipment for the offshore and shipbuilding industries. The very nature of the organization (which constitutes a multinational business group) calls for clarity in the common operating principles and some Corporate Policies that serve as a framework for the correct performance of all our activities and in our relationships with the different stakeholders.
2. Our business project is focused on the following **Mission**: “We design, develop, manufacture and supply products and services in a safe, profitable and innovative way to meet the expectations of our clients. And we do it with qualified, motivated and prepared human teams to manage change. ”

1.2. Commitment to the environment at Vicinay

1. **VICINAY GROUP** is a company that assumes the commitment to ensure the greatest respect for the environment in the development of our activities, as well as to minimize the negative effects that, eventually, these could cause. For this, management systems have been implemented for years, being certified by external auditors for years in their main individual companies and/or business units.
2. **The environmental commitment for VICINAY GROUP** implies the development of its business activities in a responsible and sustainable way, respectful of the environment, preventing and minimizing impacts, carrying out an efficient management of resources and trying to reduce the waste produced. Said commitment is expected of all persons who design, supply, manufacture and render such products and services.
3. Therefore, the Board of Directors of **VICINAY S.A.**, in its capacity as parent company of VICINAY GROUP, as established by law, aware of the importance and criticality of environmental management, considers it necessary to establish **strategic guidelines established in the present Corporate Policy for its achievement.**



2. PURPOSE OF THE POLICY

2.1. Object

1. The fundamental purpose of this policy is: **“To develop the products and services offered by Vicinay, S.A. and its subsidiaries, in a responsible and sustainable manner, respectful of the environment.”**
 2. The objective of this Policy is to serve as a **guide to Management** in the development of this matter. The **operational pillars** on which this statement is built are our business values, the Code of Ethics, this policy, and other procedures associated with its use.
1. **Management** undertakes to promote and implement all the necessary mechanisms to ensure the **development of the business values related to this Policy** in all the companies and/or business units of Vicinay, S.A., taking into account the different activities carried out and the different requirements in each of them.

2.2. Scope

1. This Policy **affects each and every one of the individuals in the VICINAY** companies and its consolidated group, **regardless** of
 - a. their responsibility within the organization and the society in which their activity is framed,
 - b. the existence in their company and/or business unit of a specific environmental function,
 - c. the type of employment, commercial or other relationship with the organization.
2. This Policy **has the character of a Corporate Policy**, which is why it is approved by the management body of **VICINAY, S.A.**, and is assumed by the other management bodies of the affected companies, whether or not there is formal adherence to their management bodies.
3. **Consequently, the individual companies and/or business units of Vicinay**, through their Management and their respective administrative bodies:
 - a. **will establish their Specific Policies** with a scope reaching all the people of their organization (partners/shareholders, administrators, management and other internal or external affected persons).
 - b. will develop its strategic business objectives within the framework established in this Policy, **showing its commitment to internal or external information actions, coordination of tasks and training derived from its application.**
4. They will establish the **responsibilities** for its development, implementation and supervision, as well as the periodicity for its supervision and reporting.
5. Those individual companies and/or business units that had a Policy on said matter prior to the approval of this Corporate Policy, **will follow that as a Specific Policy**, without prejudice to future adaptations to the guidelines established in this document, which they must not contravene.



3. BASIC PRINCIPLES OF ACTION

1. In order to be able to satisfactorily fulfil their mission, the Environmental Offers of **VICINAY GROUP** desarrollarán su función bajo los siguientes principios básicos de actuación:
 - a. **Establish systems to fully integrate the management of prevention, protection and respect for the environment in the organization's strategy.**
 - b. **Deploy an environmental culture** in each company and/or business unit of **VICINAY, S.A.**, based on the commitment of the Management and/or Administration Body, in order to achieve an effective environmental performance.
 - c. **Promote the culture of continuous improvement in environmental management, which includes risk assessment, planning and prevention activities through control and continuous improvement processes, establishing measures and actions**, including those for the allocation of human and/or material resources, aimed at efficiency, reducing impacts and the consumption of energy and resources associated with our activity, complying with the contractual commitments acquired and the applicable legal regulations.
 - d. Review the results to continuously improve their effectiveness by **following management reference frameworks** that take into account our talent, following advanced management models and applying lessons learned.
 - e. **Promote the understanding and dissemination of our Environmental Policy** within the organization, through continuous training and communication with our partners, workers, suppliers, collaborators and interest groups and thus promote their sense of responsibility in preserving the environment.
 - f. **Extend our principles** of commitment to the environment to customers, suppliers and stakeholders.
 - g. Make our organization a recognized **business reference** that reinforces our pride of belonging.

4. STRUCTURE OF ENVIRONMENTAL SUPERVISION

4.1. The Board of Directors or Administrators

1. The administrators of each company and/or business unit of VICINAY, S.A., with it at the head, **are responsible for promoting the preparation, implementation, development, supervision, reporting and periodic adaptation of the necessary Specific Policies**, following the basic principles of action established in this document.
2. **Said Specific Policies must define the supervision structure of the Environment Policy, defining a person in charge** who will set its objectives and indicators, and who must periodically report to the corresponding Directorate and/or Administrative Body.
3. The administrators of each company and/or business unit of VICINAY, S.A., **will promote and foment the implementation of environmental management systems** and will evaluate the convenience of obtaining the certification of their suitability and effectiveness through the verification of independent and prestigious entities
4. **The administrators of each company and/or business unit of VICINAY, S.A., will consolidate the information on the management of environmental risks** through the progress information that is periodically established on objectives, indicators and main actions and/or strategic deviations that have occurred.

4.2. The Directors

1. **The Management** of each company and/or business unit of VICINAY, S.A., as the head of its organization, will **ensure that the Environment function is effectively governed by the basic principles of action** declared in this Policy, guaranteeing that the management system is implemented properly and effectively to achieve its objectives within their respective fields of action.
2. Its **main compliance-related functions** include the following:
 - i. **Lead the organization by example**, publishing their commitment to the strategy, values and environmental risk management systems adopted by the organization, which they will know and make known within it.
 - ii. **Ensure the integration of the Environmental Management System in the business model, for the fulfilment of the business strategy and objectives in their areas of responsibility.** To do this, they will properly monitor the environmental objectives and adopt the preventive, detective or corrective measures that are required in each case, and will periodically review the company project, the business model and the main strategic challenges.

iii. **Make proposals for improvements on the internal organization model necessary** at all times for the effective development of the strategy and defined management systems, ensuring the deployment of the commitment to the Environment in each company and/or business unit.

iv. **Ensure that each area and function has the necessary resources**, and that it has due access to the business information and processes necessary for its correct performance, as well as to the discussion and decision forums where matters within its competence are dealt with.

4.3. Environmental Officer

1. **The Environment department function is an internal function within the organization**, which is attributed the **internal functions of advice, coordination, development, implementation and effectiveness and suitability** in environmental matters and its management systems.

2. **Its officer will work in coordination with the Chief Compliance Officer and under his leadership**, in the assurance of the Environmental requirements coinciding with the Compliance management system of VICINAY, forming part of the Compliance Committee, when so established.





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