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Nº of Revision	Date (dd/mm/yyyy)	Description of Change or Modification
1	06/03/2023	Original Document.
2	23/08/2023	The following reference documents were added: Policy "Política Tolerancia Cero Corrupción (TCC)" SGC-PO-003 and Manual "Manual Responsable del Cumplimiento Antisoborno" SGC-MA-104. The document was reissued to comply with the requirements of the Cisco Partner Compliance Assessment (CPCA) v2.0 (2.1 & 2.2), including the anti-bribery objectives.
3	16/07/2025	The definitions of corrupt behavior and corruption have been reviewed. Additionally, the Board of Directors' commitment to the Anti-Bribery Management System (ABMS) policies and requirements has been integrated, and a public access link to the policy has been added.
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1. Objective

The objective of this document is to establish the Anti-Bribery Policy statement of the company.

2. Scope

The guidelines established in this policy apply to all members of the company.

3. Reference Documents

Nº	Título
1	Política de ITCS-BO. Tolerancia Cero Corrupción (TCC) SGC-PO-003
2	
3	Procedimiento de ITCS-BO. Sistema de Quejas y Denuncias SGC-PR-003
4	
5	Manual de ITCS-BO. Código de Conducta Empresarial ADM-MA-001; Manual de ITCS-BO. Responsable del Cumplimiento Antisoborno SGC-MA-104
6	Plantilla - Planificación de Objetivos Antisoborno SGC-PO-002-001; Plantilla - Cuadro de Mando Integral (CMI) SGC-PR-002-005

4. Terms, Definitions, and Abbreviations

Disciplinary Action: Measures taken by the company in response to breaches (contractual, behavioral, etc.) committed by employees and/or business partners.

Good Faith: Performing an action or report with the intent of notifying behavior, acts, or attitudes that violate company policies and/or the Code of Business Conduct.

Code of Business Conduct: Document that establishes a framework of values and desirable behaviors, serving as a reference for employee conduct in their duties, workplace relationships, and interactions with business partners.

Corrupt Behavior: Act of abusing power or trust to obtain a private benefit or undue advantage, included within the concept of Corruption.

Conflict of Interest: A situation in which business, financial, family, political, or personal interests could interfere with an employee's judgment in fulfilling their obligations to the company.

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Corruption: Abuse of power to divert company funds toward a private benefit or to obtain an undue advantage. Includes acts such as bribery, fraud, embezzlement, influence peddling, undeclared conflicts of interest, and any prohibited negotiation or activity.

Due Diligence: Process for assessing in detail the nature and extent of bribery risk to help organizations make decisions regarding operations, projects, activities, business partners, and specific personnel.

Report: The act of informing, through official company communication channels, of the existence of corrupt behavior.

Whistleblower: Person who reports, through official company channels, a possible violation of company policies or procedures.

Violation: Breach or non-compliance with company policies and/or the Code of Business Conduct.

Retaliation: Punitive or disciplinary response taken against someone for having made a report.

Contract Termination: Legal action used to nullify a previously signed contract between two parties, effectively ending a previously agreed obligation.

Sanction: Punishment or reprimand as a consequence of violating company policies and/or the Code of Business Conduct.

SGAS: Anti-Bribery Management System.

SGC: Quality Management System.

Complaints and Whistleblowing System: Tool that allows confidential (anonymous or identified) reporting, via a simple form, of potentially irregular activities and behaviors that may constitute violations of the Code of Business Conduct or unethical acts.

Bribery: Offering, promising, giving, accepting, or soliciting an undue advantage of any value (financial or non-financial), directly or indirectly, regardless of location, in violation of applicable law, as an incentive or reward for a person to act or refrain from acting in relation to their duties.

M-Files: Information and Content Management System used within the company.

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5. Responsibilities

Board of Directors: Responsible for developing the company's Anti-Bribery Policy statement, monitoring compliance with ethical conduct standards, ensuring the proper investigation of potential irregularities, assessing conclusions, and deciding on disciplinary measures or legal actions, as applicable.

Anti-Bribery Compliance Officer: Responsible for receiving reports, analyzing them, and if necessary, speaking with the whistleblower and the person responsible for the alleged violation. Provides feedback and advice to the Board of Directors.

Directorate-Appointed Responsible Officer: Designated by the Board of Directors to ensure the provision of all necessary resources for the management of the QMS.

QMS Officer: Responsible for maintaining, securing, and controlling QMS documentation.

6. Development

ITC Servicios S.R.L. prohibits direct or indirect bribery and conducts its operations with integrity, in full compliance with applicable laws, and is committed to the strict requirements of its Anti-Bribery Management System (SGAS). Likewise, ITC Servicios S.R.L. personnel and business partners must comply with internal policies and procedures, as well as with national and international anti-bribery laws.

6.1 Anti-Bribery Policy

It is strictly forbidden for any person, on behalf of or representing ITC Servicios S.R.L., to attempt to obtain or retain business, secure an improper advantage, or engage in misconduct in violation of the company's internal documents, local laws, or international anti-bribery laws and practices.

ITC Servicios S.R.L. adheres to the commitment of continuous improvement of the Anti-Bribery Management System and encourages the raising of concerns in good faith or on the basis of a reasonable belief, with confidence and without fear of retaliation, by all staff under any form of engagement, as well as by any other interested party and/or business partner.

ITC Servicios S.R.L. has zero tolerance for bribery. This means that all suspected incidents of bribery will be investigated, and any misconduct may result in disciplinary measures for ITC Servicios S.R.L. staff, or sanctions in the case of professional services providers, partners, suppliers, or even clients.

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All ITC Servicios S.R.L. staff have a duty to report in good faith any facts or conduct suspected of constituting criminal acts. Adequate communication channels have been established through corporate procedures, ensuring impartial investigation and potential sanction by the Board of Directors of ITC Servicios S.R.L.

This Policy is appropriate to the purpose of ITC Servicios S.R.L. and provides the framework for establishing, reviewing, and achieving Anti-Bribery objectives. It must be known, communicated, and applied by all staff of ITC Servicios S.R.L., including shareholders/partners, management, and all personnel under any form of engagement, as well as by any other interested party, who must ensure they are not involved in bribery activities and commit to understanding, accepting, and applying the principles set forth in this Policy. The Anti-Bribery Policy is publicly available to all relevant stakeholders on our official website: <https://itc-e.com/acerca-de-itc/>.

ITC Servicios S.R.L. has an Anti-Bribery Compliance Officer, whose responsibilities include overseeing the proper development, review, and implementation of the guidelines established in this Policy. This role addresses conflicts related to the Policy in coordination with the Board (when required), and establishes action plans to resolve them and safeguard the interests of ITC Servicios S.R.L.

ITC Servicios S.R.L. is committed to ensuring that the Anti-Bribery Compliance Officer is provided with adequate resources and is assigned to individuals with the competence, position, authority, and independence to remain impartial, even when performing other roles, and who have direct and timely access to the Board in order to raise any bribery or Anti-Bribery Management System concerns.

6.2 Anti-Bribery Objectives

ITC Servicios S.R.L. declares its commitment to maintaining Anti-Bribery objectives so that all company personnel involved in the Anti-Bribery Management System focus their efforts on achieving compliance.

- Train key personnel on the implementation and interpretation of ISO 37001:2016.
- Analyze employee profiles to identify motivational influences (moral, legality, indifference, and corruption) and interests (economic, political, social, and religious).
- Raise awareness and train all employees in bribery prevention and mitigation, enabling them to identify and address possible bribery situations or acts.
- Strengthen the initiative for reporting acts of corruption and communicate the corresponding consequences and sanctions according to company policies.
- Strengthen the company's effective communication on compliance and bribery prevention.
- Strengthen mechanisms for managing reports of alleged acts of corruption.

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The management of Anti-Bribery objectives is recorded using the **Plantilla - Planificación de Objetivos Antisoborno SGC-PO-002-001** and is part of our **Cuadro de Mando Integral (CMI) SGC-PR-002-005** to ensure monitoring and strategic alignment.

7. Records

N/A

8. Annexes

N/A