

ANTI-BRIBERY MANAGEMENT SYSTEM POLICY

EMAPAG EP

This ANTI-BRIBERY POLICY reflects that EMAPAG EP permanently demonstrates a high commitment to carrying out its activities with the utmost level of ethics, integrity, and compliance with current legislation, appropriate to the purpose of our institution.

At EMAPAG EP, we are committed to combating bribery in all its forms through the establishment of principles, policies, and procedures that guide the behavior of all our employees, business partners, creditors, and other stakeholders.

At EMAPAG EP, **WE EXPRESSLY PROHIBIT BRIBERY** in all its forms, whether directly or indirectly, in relation to a public official or agency, or to a private person or institution, as well as any type of behavior or action that may constitute a violation of current anti-bribery legislation.

The Board of Directors of EMAPAG EP has approved this POLICY and has allocated the necessary resources and mechanisms for the proper implementation of an **ANTI-BRIBERY MANAGEMENT SYSTEM** (hereinafter SGAS), aligned with the requirements of the international standard **ISO 37001:2016** and the applicable anti-bribery legislation in the execution of our activities, to prevent, control, and manage any risk of bribery to which our Institution may be exposed.

This ANTI-BRIBERY POLICY applies to all members of EMAPAG EP, an institution located at the Las Cámaras Building, Tower B, Guayaquil – Ecuador, in the execution of its activities related to ***"Regulating and controlling the contracted concession for drinking water, sanitary and storm sewer services in the city of Guayaquil, and executing related works"***.

At EMAPAG EP, we identify and periodically assess bribery risks to which our activities are exposed, documenting the results in our **RISK MATRIX**. We establish control and mitigation plans for our risks, analyzed and evaluated, with the clear objective of preventing and reducing their likelihood, as well as establishing monitoring and control mechanisms.

As a result of internal and external mechanisms for evaluating the effectiveness of our **ANTI-BRIBERY MANAGEMENT SYSTEM**, and based on the information collected, analyzed, and evaluated, we have established control and monitoring measures, **committing to continuously improving** the effectiveness of our SGAS, with the objective of creating an authentic system capable of adapting to changing market circumstances and improvements, opportunities, and detected failures.

At **EMAPAG EP**, we are committed to complying with the anti-bribery laws applicable to us as an institution, as well as meeting the requirements of the ISO 37001:2016 Anti-Bribery Management System.

To ensure maximum independence, we have designated the Planning and Institutional Management Directorate to perform **the Compliance Function**, endowed with capacity, autonomy, independence, and authority, to ensure, under the direct supervision of the governing body, the proper design, implementation, monitoring, and improvement of our ANTI-BRIBERY MANAGEMENT SYSTEM.

We have an **Internal Regulation** currently in force and approved by the Board of Directors. Our internal regulation, as well as the disciplinary consequences for its action or non-compliance, apply to all members of **EMAPAG EP**, without prejudice to the legal consequences that may arise for acts, facts, or behaviors constituting a violation of the law. In this sense, **we have a disciplinary system, managed by the Talent Management Unit and coordinated with the Legal Advisory Directorate**, to sanction behaviors contrary to this POLICY, our Internal Regulation, and other related regulations, as well as the other requirements of our ANTI-BRIBERY MANAGEMENT SYSTEM.

Every member of our Institution, employee, executive, representative, and/or person acting in an authorized manner on behalf of **EMAPAG EP**, is obliged to inform and/or report any action, behavior, information, or evidence that may violate this POLICY or the requirements of the ANTI-BRIBERY MANAGEMENT SYSTEM of **EMAPAG EP**, and that may constitute a criminal act by action or omission.

At **EMAPAG EP**, we have created platforms so that our stakeholders can report any type of suspicious act or conduct related to bribery or raise any questions or concerns in this regard. For this purpose, a **REPORTING CHANNEL** has been implemented, which is available on our Institution's website or directly at the link:

<https://www.sofidya.com/emapagep/canal-denuncias>

At **EMAPAG EP**, we value and strongly encourage the communication of any indication or suspicion of legislation violations by any member, person, or institution linked to our public company. We greatly appreciate as much detail as possible in the exposition of reported or communicated facts.

Our Institution has established secure internal mechanisms and processes to ensure the confidentiality of received reports and communications, as well as to protect individuals who participate in our anti-bribery objective through communication and reporting from any threats or coercion.

This policy establishes the strategic elements necessary to provide a reference framework for the establishment, review, and achievement of anti-bribery objectives in our Institution.

Abril 2024

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MUNICIPALIDAD
DE GUAYAQUIL
POR GUAYAQUIL INDEPENDIENTE



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DE GUAYAQUIL



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ENTE MUNICIPAL DE REGULACIÓN Y CONTROL