

Anti-Bribery and Anti-Corruption Policy

Purpose	<p>This policy sets forth AAE's commitment to integrity, transparency, and ethics in all its operations, expressly prohibiting bribery and corruption in any form.</p> <p>Its purpose is to prevent, detect, and respond to misconduct, protecting the company's reputation and ensuring compliance with Uruguayan law, international standards, and contractual commitments.</p>
Scope	<p>This policy applies to:</p> <div><div></div><div>a. All AAE personnel, at all locations and in all projects.</div><div></div><div>b. Consultants, contractors, suppliers, and strategic partners acting on behalf of AAE.</div><div></div><div>c. All activities, including tenders, contracts, project execution, and relationships with authorities and communities.</div></div>

Definitions**Bribery:**

Promising, offering, giving, soliciting, or accepting any undue benefit to obtain or retain business or an advantage.

Corruption:

Abuse of power or position for personal or third-party benefit, in violation of law or ethics.

Facilitation:

Small payments made to expedite routine processes (prohibited under this policy).

Principles

1. Zero Tolerance: Bribery will not be permitted or justified under any circumstances.
2. Legal Compliance: All operations shall comply with applicable national laws and international treaties.
3. Transparency: All transactions and decisions must be properly documented.
4. Shared Responsibility: All members of AAE have an obligation to prevent, detect, and report misconduct.

Prohibited Conduct

1. Offering or accepting gifts, payments, travel, donations, or favors that could unduly influence a decision..
2. Making facilitation payments, even if of low value.
3. Altering documents, concealing information, or falsifying reports to gain an advantage.
4. Using intermediaries or third parties to conceal acts of bribery or corruption.

Implementation Procedures

Risk Assessment

Before starting projects, conduct an analysis of bribery and corruption risks in the country/region and sector.

Identify critical points (tenders, permits, relationships with authorities).

Third-Party Due Diligence

Verify the background of suppliers, partners, and consultants.

Include contractual clauses requiring compliance with this policy.

Gifts and Hospitality

Record all gifts and courtesies received or given, regardless of value.

Reject any gift that could be perceived as an attempt to influence.

Financial Controls

Maintain clear and accurate records of all transactions.

Prohibit unauthorized cash payments and transactions outside official channels.

Reporting Channel

Enable a secure, confidential, and anonymous channel for reporting misconduct (email, physical drop box, telephone line).

Ensure there are no reprisals against whistleblowers acting in good faith.

Training

Provide annual training to all personnel on risks, warning signs, and anti-bribery procedures.

Provide specific training for high-risk areas (procurement, tenders, government relations).

Incident Response

Receive and record the report.

Conduct an initial assessment and, if applicable, open an internal investigation.

Apply corrective and disciplinary measures according to the outcome (including dismissal and notification to authorities).

Communicate actions taken to Management and, where applicable, to relevant stakeholders.

Monitoring and Review

Conduct periodic internal audits to verify compliance.

Review the policy annually to incorporate lessons learned and regulatory changes.

Approval and Entry into Force

This policy enters into force upon approval by AAE's Board of Directors and is mandatory for all persons and entities within its scope.