



ANTICORRUPTION POLICY

REVIEW No. 0

DATE: 04-04-19

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COMPANY:

GRUPO ANTOLIN

COUNTRY:

ALL

1. - PURPOSE

In GRUPO ANTOLIN we are committed to the highest ethical standards that do the Company a model of unique behavior, reiterating the commitment of GRUPO ANTOLIN with the strict compliance with the rules of prevention and combat against **Corruption (1)**, developing the principles collected in the Code of Ethics and Conduct and extending its compliance not only to all employees of the companies in with GRUPO ANTOLIN exercises direct or indirect control of the management, but also to our **Business Partners (2)**.

2. - SCOPE

This policy applies to all operations of GRUPO ANTOLIN.

3. - PRINCIPLES OF ACTIONS

GRUPO ANTOLIN rejects all forms of corruption (either: active, passive, private or with government officials) applying a zero tolerance criterion regarding any breach of this Policy.

To prevent corruption , GRUPO ANTOLIN carry out all its activities in accordance with the legislation in force in all fields of action and in all the countries in which it operates, according to its spirit and purpose, and undertakes to:

- ✓ No influence the will or objectivity of people outside the Company to obtain any benefit or advantage through the use of unethical practices and/or contrary to the applicable law ([See Anticorruption and Bribe presentation](#)).
- ✓ Not give, promise or offer, directly or indirectly , any **Good of value (3)** to any individual or legal entity , in order to obtain undue advantages for the company , according to [I-P115-B, Gifts and Hospitality Policy](#)
- ✓ Do not allow any **Facilitation Payment (4)**.
- ✓ Do not finance, or show support of any other kind, directly or indirectly, to any political party, its representatives or candidates, or to use donations to cover up undue payments ([See presentation of guidelines of Donations and Contribution](#))
- ✓ Not solicit or perceive unduly, directly or indirectly, commissions, payments or benefits of third parties on the occasion of or with cause in the investment, divestment, and financing or operations carried out by the company.
- ✓ Pay special attention to those cases in which there are signs of lack of integrity of the persons or entities with which business is conducted, in order to ensure that GRUPO ANTOLIN establishes business relationships only with qualified individuals and entities with an adequate reputation, according to [G-P115-III, DUE DILIGENCE MANAGEMENT](#).
- ✓ Reflect faithfully and adequately all actions, operations and transactions of the Company in the books and records of the same ([See Guide: Management of Our Records](#))
- ✓ Promote internal training in the prevention and fight against corruption ([See Anticorruption Training](#)).



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4. - COMUNICACION OF NON-COMPLIANCE EVENTS

If the Employees have evidence, doubts or suspicions regarding any form of corruption, they should immediately inform their hierarchical superior, the Legal Services or the Compliance Division. Both the employees of the Company and any third party may also transmit their doubts or concerns through the Transparency Channel. GRUPO ANTOLIN will not tolerate any retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this Policy.

Employees who violate these provisions will be subject to the corresponding disciplinary measures, with all the rigor allowed by current regulations.

Likewise, GRUPO ANTOLIN will reserve the right to adopt the measures it deems appropriate against Business Partners that violate this Policy.

GRUPO ANTOLIN believes that complying with this Policy is the responsibility of all its Employees.

APPROVED

DATE: 04-04-19

SIGNATURE : J.Pascual

(1) Corruption: Offering, promising, granting, receiving, requesting or accepting an unjustified benefit, for oneself or for a third party, to unduly favor another in the acquisition or sale of goods, in the contracting of services or in relationships commercial.

(2) Business Partners: Partners, contractors, suppliers, agents, distributors, non-operated joint ventures and other collaborating companies.

(3) Good value: Money in cash or equivalent to cash, loans, gratuities, advantages or benefits of any kind.

(4) Facilitation payment: Small amount payment made to lower level public officials, whose purpose is to speed up or facilitate the performance of their responsibilities, such as access to public services, obtaining ordinary licenses, permits of business or administrative procedures.