



GIFTS AND HOSPITALITY POLICY

REVIEW Nr 0

DATE 03-10-17

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COMPANY:

GRUPO ANTOLIN

COUNTRY:

ALL

Grupo Antolin, within its anti-corruption standards, is forbidden from promising, offering, receiving or granting, by personally or through an intermediary, to managers, administrators, employees or collaborators of a commercial company or an entity, association, foundation or organization, any benefit or advantage of any unjustified nature to favour himself or a third party, failing in its obligations in the acquisition or sale of goods, services procurement or in trade relations.

GIFTS AND HOSPITALITY SERVICES

The delivery or acceptance of money in cash is prohibited.

Overall Grupo Antolin does not offer or receives any type of gift, or hospitality service to officials, private entities, customers or suppliers.

In the event that a courtesy takes place, it will be:

- ✓ It will be reasonable and appropriate to the circumstances;
- ✓ It will be not motivated by a desire to influence inappropriately in the official, customer or supplier;
- ✓ It will be a pleasant gift, in line with standards of professional courtesy generally accepted in the country where it is offered;
- ✓ It will be offered with openness and transparency;
- ✓ It will be offered in good faith, with no expectation of reciprocity;
- ✓ It will be offered on the occasion of a festivity or event where it is common to exchange gifts, in the case of presents;
- ✓ It will be offered with a legitimate business purpose, in the case of travel and hospitality services;
- ✓ It will NOT be offered to any official, customer, or received from a supplier with a regularity or frequency which may generate a inadequate perception or distort the purposes of the present Policy; and
- ✓ It will comply with the current laws and local regulations, which apply to government officials, customer or supplier.

"Hospitality service" means entertainments, meals, accommodation and transport.

Any question concerning the application of this policy, please contact your direct manager or Compliance Management.

APPROVAL	
DATE: 03 OCT 2017	SIGNATURE:  J. Pascual