

## GIFTS AND HOSPITALITY POLICY

REVIEW No.	1
DATE	05-10-2023
PAGE	1 OF 1

COMPANY:

ANTOLIN

COUNTRY:

ALL

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 favor 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 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 inexpensive (< 60\$ / <50€)*
- ✓ 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 NOT be offered to any official, customer, or received from a supplier with a regularity or frequency which may generate an inadequate perception or distort the purpose 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 entertainment, meals, accommodation and transport.

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

#### APPROVED - MANAGEMENT

DATE: 05-10-2023



SIGNED: J. Garcelan