

Policy number:	A1-89
Policy title:	Anti-Corruption and Anti-Bribery Program
Effective date:	April 14 <sup>th</sup> 2021
Version:	2
Owner:	Compliance Officer
Description	This policy describes and establishes the Anticorruption & Antibribery principles and guidelines applicable to the Quadpack Group.



## ANTI-CORRUPTION AND ANTI-BRIBERY PROGRAM

In 2016 QUADPACK adopted a specific Anti-Corruption and Anti-Bribery Program ensuring that management, employees and any relevant external actors were aware of our policy regarding the acceptance and receipt of gifts, encouraging lawful conduct and avoiding any actions or omissions that might suggest a breach of this program.

In our commitment to transparency, competitiveness, efficiency, and responsible governance, the board of directors of QUADPACK has decided to review its Anti-Corruption and Anti-Bribery Programme, taking guidance from applicable laws such as the Spanish Criminal Law, the Foreign Corruption Practices Act and the UK Bribery Act.

QUADPACK's Anti-Corruption and Anti-bribery Programme is based on the principle of Zero Tolerance of bribery. QUADPACK prohibits bribery and it will not tolerate its directors, management, employees or third parties in their relationship with QUADPACK, being involved in bribery, whether by offering, promising, soliciting, demanding, giving or accepting bribes or behaving corruptly in the expectation of a bribe or an advantage.

This policy extends to all the QUADPACK's business dealings and transactions in all countries in which it or its subsidiaries and associates operate.

All QUADPACK members (starting with the Board of Directors) commit in all cases, to act in full compliance with this program and to maintain the trust of clients, suppliers and third parties protecting the business the reputation in the market.

Consequently, all QUADPACK members (hereinafter referred to as "Quadpacker/s") irrevocably undertake to comply with the following:

### **I. ACCEPTANCE AND OFFER OF FINANCIAL OR OTHER ADVANTAGE:**

No Quadpacker shall request, accept or offer, give and promise any financial or other advantage such as payments, presents, commissions or compensations from any third party with whom QUADPACK has professional relations (*clients, suppliers, agents, etc.*), whether they are an individual or legal entity.

Within this general prohibition, Quadpackers shall specifically not request, accept, offer, give or promise any gift consisting of cash, as well as any gift card, check or equivalent for the purchase of goods or services.

Specifically, all Quadpackers are not allowed to request, accept, offer, give or promise gifts, hospitality, kickbacks or other expenses of any kind that could influence or be perceived to be capable of influencing a contractual or material transaction and specially:

- To affect business relations, with clients or suppliers, to create any advantage, difference of treatment, business expectation, ability to influence or obligation to contract with them.
- That may affect Quadpacker's professional activity in any way at QUADPACK, so as not to perform my work independently and objectively.
- Which are contrary to any legislation, regulation or policy, whether external and general or internal and belonging to the QUADPACK Group.

No Quadpacker will request, accept, offer, give or promise leisure trips or services of any kind for themselves or any family member, which are paid for by third parties with whom they have professional relations.

## II. GUIDELINES FOR PROMOTIONAL EXPENSES:

Promotional expenses are only permitted if such expenditures are transparent, proportionate, reasonable, and in good faith.

Promotional expenses shall be only permitted if are in compliance with the following:

- I. Made for the right reason: Any gift or hospitality must be given clearly as an act of appreciation for a *bona fide* business purpose.
- II. No obligation: the gift, hospitality or reimbursement of expense does not place QUADPACK under any obligation.
- III. No expectations: do not create expectations of gaining an additional advantage, better position or preferential treatment by offering or accepting such gift or hospitality.
- IV. Made openly: promotional expenses must be transparent and duly document as transparent is its purpose. If the promotional expense is secretly and undocumented then the purpose will be open to question.
- V. Reasonable value: the size and the value of the gift, hospitality or reimbursed expense complies with general business practice and local customs.
- VI. Appropriate: the nature of the gift, hospitality or reimbursed expense is appropriate to the relationship and complies with general business practice and local customs.
- VII. Legality: it is compliant with relevant applicable laws.

- VIII. Reported: the gift, hospitality or expense must be recorded and reported to the respective Area Director. Board members shall report to the Compliance Officer. Reporting will be done through the Bamboo HR tool by using the Gift & Promotional Expenses Reporting Sheet attached to this document as Annex 1.

### **III. OFFER, PROMISE OR GIVE FINANCIAL OR OTHER ADVANTAGE TO PUBLIC OFFICIALS**

Quadpackers shall not make, promise, nor offer, either directly or indirectly, any payment in cash or kind or any other benefit, to any individual or legal body in the service of any authority or entity, whether public or private, political party or candidate for a public role, in order to unlawfully obtain or maintain business or other advantages, or in order for them to abuse their influence, whether real or apparent, to obtain them.

Furthermore, no Quadpacker shall:

- make any payments for the facilitation or streamlining of procedures, consisting of the giving of money or any financial or other advantage of any kind, whatever the amount or value, in exchange for ensuring or expediting the course of a procedure or action before any judicial body, public authority or agency official (national or foreign). Facilitation payments are “*small unofficial payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement*”. Facilitation payments are in all cases prohibited.
- influence an official, using personal relationships to gain a benefit for themselves or for QUADPACK.
- alter or simulate documents to mislead as to their authenticity, nor shall be untruthful in the narration of the facts or any other false act before public bodies, intended to obtain public grants or subsidies, licenses, concessions or any other type of financial or administrative advantage.
- participate in any manner of cooperation or complicity in the conduct of officials who fail to act (*knowingly issue unfair resolutions*), omit to pursue crimes that they are aware of, act with unfaithfulness in the custody of documents, discover or reveal secrets about their role, misuse public funds, conduct negotiations that are prohibited by reason of their position, or misuse privileged information.
- participate in any case in the improper obtaining of subsidies, relief or aid, falsifying the requirements for this to be granted or hiding the conditions that would have prevented it; nor in the undue enjoyment of this, breaching the conditions or substantially altering the purposes for which it was granted; nor in the theft of funds, income or public effects, for profit, being the person in charge, the administrator or depositary thereof.