

## ANTI-CORRUPTION AND ANTI-BRIBERY PROGRAM

QUADPACK has adopted a specific Anti-Corruption and Anti-Bribery Program in order to inform all of its employees and those around them of its policy regarding the acceptance and receipt of gifts, and to encourage lawful conduct avoiding, and in turn investigating, any actions or omissions that might suggest a breach, thus resulting in liabilities.

All employees of the Group are required, in all cases, to act in full compliance with this policy to maintain the trust of clients, suppliers and authorities with whom QUADPACK has professional relations, and thus protect the business from any non-compliance and to maintain a good and meticulous reputation in the market.

QUADPACK employees irrevocably undertake to comply with the following precepts on Anti-Corruption:

### **ACCEPTANCE OF GIFTS FROM THIRD PARTIES:**

I will not accept any type of payment, gift, present, commission or compensation from any third party with whom I have professional relations (*clients, suppliers, agents, etc.*), whether they are an individual or legal entity.

Within this general prohibition, I will specifically not accept the receipt of any gift consisting of cash, as well as any gift card, check or equivalent for the purchase of goods or services at any establishment.

Specifically, I will not allow the use of gifts or kickbacks of any kind:

- 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 my 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.

I will not accept leisure trips or services of any kind for myself or any family member, which are paid for by third parties with whom I have professional relations.

### **THE PROVISION OF GIFTS TO THIRD PARTIES:**

- I will not give any gifts that consist of cash, cash cards or cheques that allow their use as such, regardless of the manner.
- I will only give gifts to third parties as a professional service, provided that this practice is commonly accepted and has an economic, fair, public and reasonable value.

### **GUIDELINES FOR ACTION UPON THE RECEIPT OR DELIVERY OF GIFTS:**

If any third party should offer me, or give me, any gift or present:

- I will expressly and immediately inform them that I am not able to accept the gift and will return it to them immediately.
- I will inform my hierarchical supervisor about the gift offered or received.

### **THE GIVING OF GIFTS AND FAVOURABLE TREATMENT TO PUBLIC OFFICIALS**

- I will not make, 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.
- I will not make any payments for the facilitation or streamlining of procedures, consisting of the giving of money or any other item of value, whatever the amount, in exchange for ensuring or expediting the course of a procedure or action before any judicial body, public authority or agency official.
- I will not influence an official, using personal relationships I have with them to gain a benefit for myself or for QUADPACK.
- I will not alter or simulate documents to mislead as to their authenticity, nor will I 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.
- I will not 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.
- I will not 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.