incatema
consulting & engineering

COMPLIANCE POLICY

Gift Policy

1. Introduction

The purpose of this document is to define the aspects to be taken into consideration in:

a) Accepting gifts, courtesies, invitations, etc., of any type, from any third party (suppliers, clients, etc.,) on the part of any member of the INACATEMA Group.

b) Presenting gifts, courtesies, invitations, of any type, to third parties by any member of the INCATEMA Group.

2. Gift acceptance policy

As a general rule, **no employee, member of the INCATEMA Group or senior executive may request or accept any type of payment, gift, courtesy, commission or remuneration** of any nature with any third party with whom there is a professional relationship - clients, suppliers, etc., - whether a legal entity or private individual. This rule is applicable in general to all employees, but especially to positions of responsibility within the Group, irrespective of the area of activity or hierarchical level.

This **general prohibition** specifically includes the **receipt of any gift involving money in cash**, or any gift card or cheque or equivalent item for the purchase of goods or services in any establishment.

In particular, INCATEMA prohibits the use of gifts or courtesies of any nature to:

i. Influence commercial relations, whether with clients or suppliers, in such a way as to create any advantage, difference in treatment, business expectation, capacity to influence or obligation (direct or indirect) to contract with same.

ii. That may in any way affect the professional activity of the Group member so as not to do their job independently and objectively, in a way that is most favourable to the interest of the company to which their services are provided.

iii. That are contrary to any legislation, regulation and/or standard, whether external and general or internal and inherent to the INCATEMA Group.

However, **exceptions** are established regarding the prohibition to receive gifts, **accepting the possibility of receiving gifts provided that they fall within what may be considered reasonable and that their value cannot be considered high or exaggerated**, as established below.

Among **admissible gifts** we find the following:

- ✔ Standard gifts of a symbolic and promotional nature and of scarce financial value, such as for example: pens, diaries, notebooks, etc.
- ✔ Invitations to conferences, courses, meals, professional meetings, provided that they do not exceed limits considered reasonable in social practice, in line with the hierarchical level of the employee or director who benefits from the invitation.
- ✔ Gifts for special attention, for specific and exceptional reasons, in line with consolidated and widespread use and custom, such as for example at Christmas, provided that the gift is not made in cash (including gift cards/cheques that allow for use as if they were cash) and whose equivalent value is less than 200 euros per year for each offeror of the gift.

The acceptance of gifts or courtesies that fall within the above exceptions may only be admitted if they are voluntarily given by the third party and there is no reasonable likelihood that this could influence the objective judgment capacity or obligations of the beneficiary towards INCATEMA.

Any action outside of that strictly laid down in the points above, such as travel paid for by third parties, attendance at special sports events or those having a value of more than 200 euros, will be considered unauthorised practices, excluding the attendance at such events in corporate and official representation of INCATEMA, within common application of social and professional practices and custom.

3. Policy of gifts to third parties

There is likewise a series of prohibitions related to the presentation of gifts, courtesies, invitations, in cash and in kind, to third parties by any employee, member or senior executive of the INCATEMA Group:

a) Gifts to third parties (including invitations to sports events and other festive shows as a guest of INCATEMA) can only be presented as a professional courtesy provided that this practice is commonly accepted and has a moderate, disclosed and reasonable value.

b) It is expressly prohibited to present gifts involving money in cash or gift cards or cheques that allow for use as if they were cash, irrespective of their mode, duration, rules of use, etc.

c) It is not permitted to provide personal financial assistance to any type of client or other professional contact.

4. Guidelines for receiving or presenting gifts

There are guidelines that must be observed if any third party offers or presents any type of gift, courtesy, invitation, etc., that infringes the policy defined by the INCATEMA Group or whenever there are doubts regarding fulfilment of same on the part of the employee, member of the organisation or senior executive regarding the reception and/or presentation of any type of gift.

These mandatory guidelines are as follows:

a. Any type of gift, courtesy, compensation, advantage, opportunity that has been received from any third party and that infringes the present policy must be rejected, with the specific exceptions that have been defined for the receipt of gifts. It is likewise prohibited to present any type of gift, offer, advantage, etc., to third parties that infringes the policy of the INCATEMA Group.

b. If a gift is received that does not meet the policy rules, it must be expressly and immediately communicated to the third party that it is not possible to accept the gift, courtesy, invitation, etc., pursuant to the policy established by INCATEMA. In this situation, the gift received must be expressly returned.

c. The hierarchical superior must be informed of any gift offered or received that does not fall within the limitations contained in this policy.

d. As an exception, it will be possible to accept the gift on behalf of INCATEMA when there are circumstances that would justify this acceptance, such as:

   - the objective difficulty of returning it,
   - its institutional, symbolic or formal nature, etc.

e. Any problem, incident or doubt arising in relation to the interpretation, implementation and fulfilment of this policy, must be brought to the attention of the Compliance Officer, by sending an email addressed to compliance@incatemaconsulting.es . This channel may likewise be used for any type of enquiry, or to propose improvements.

f. Infringement of this *Policy of gift acceptance and presentation* will be considered a violation of company mandatory rules, and will therefore fall within the scope of the company's disciplinary system.

This *Gift acceptance and presentation policy of the INCATEMA Group* has been included and approved in the version of the Criminal Compliance Management System approved by the Board of Directors on 28 November 2018 and will remain in effect until such a time as it is decided to amend or derogate same.