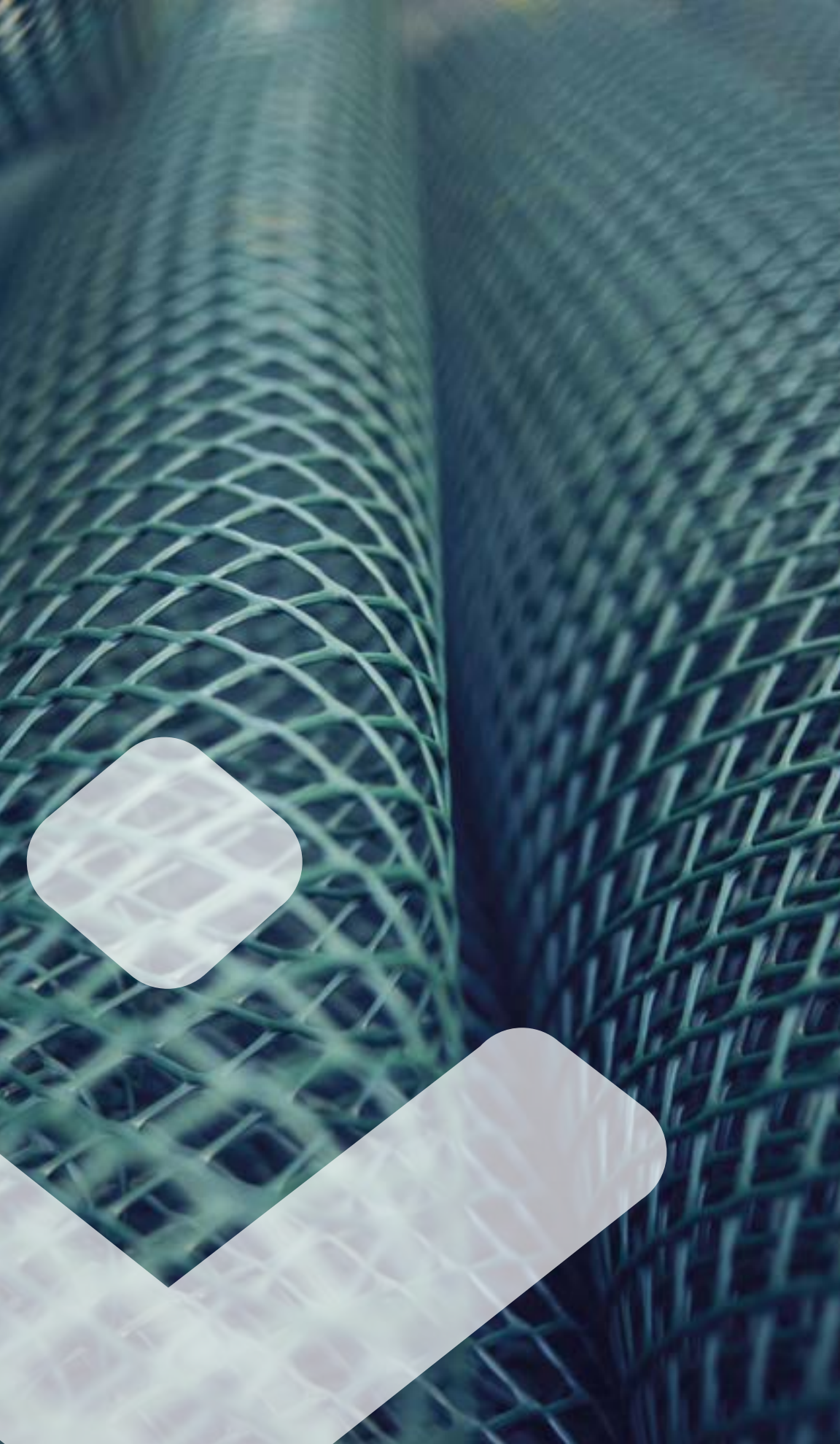


Anti-corruption Policy



 **intermas group**

Document revisions

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Changes

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Purpose

The purpose of this policy is to establish specific measures that are designed to prevent and, where relevant, detect and respond to any form of corruption, bribery or influence peddling carried out by any member of Interma Group (hereinafter “Interma Group” or “the Organisation”).

Scope of the policy

This policy encompasses all the operations that the organisation carries out at both a national and an international level, including those carried out by members of the Organisation, its subsidiaries or its branches, by its agents, salespeople, consultants or other representatives, or by any employees of companies that the Organisation works with on specific projects (business associates).



Operating principles

These principles constitute a behavioural model that should guide and govern the actions of all members of the Organisation at all times. It is designed to promote ethical, upstanding and responsible behaviour in everyone, in accordance with the [“Code of Conduct”](#) and the Crime Prevention Management System.

Intermas Group rejects corruption in all its forms and does not tolerate any kind of conduct that could constitute a criminal offence. The Organisation is fully committed to combating corruption in all its forms. Accordingly, with the aim of preventing corruption, all members of the Organisation should follow the operational guidelines listed below:

1. When carrying out their activities they should respect the rules of free market and free competition and reject any illegal or fraudulent practices that are contrary to: (i) the guidelines of the [“Code of Conduct”](#), (ii) the Organisation’s corporate policies and procedures that form the basis of the Crime Prevention Management System, and (iii) the current legislation in all the countries where the Organisation operates.



2. In relationships with stakeholders, and particularly with public authorities and officials, whether they be customers or not:

- They should strictly comply with the law and act in a legal, irreproachable, transparent, ethical and honourable manner, with professional integrity and institutional respect.
- They should always defend their independence, preventing their professional actions from being influenced by favourable treatment or financial, family or friendship connections.
- They should not make decisions, nor participate in decision making, where they could find themselves in conflicts of interest due to their relationship with decision-making people or bodies, whether directly or through their spouses (or people with whom they have a similar relationship of emotional cohabitation), immediate relatives or second-degree relatives by consanguinity or affinity.
- They should avoid any conduct that may be misinterpreted as an attempt to unlawfully obtain some undue compensation or benefit, protecting the Organisation's image and reputation at all times.
- They should abstain from unduly influencing any public authorities or officials; encouraging them to violate their duties of impartiality or any other legal precept; or proposing the provision of some kind of favour.

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3. They should not make undue payments or allow them to be made, and, in particular, they should not make or offer any payment to any natural or legal person, directly or indirectly, in cash or otherwise and under any contractual form, or any other benefit or advantage:

- In the service of any public or private authority or entity, political party or candidates for public positions, with the intention of unlawfully obtaining or maintaining business or other benefits.
- With the intention of the natural or legal person using their influence, whether real or apparent, to unlawfully obtain any form of business or other benefit from any public or private authority or entity.
- When it is known that all or part of the payment, or equivalent, will be offered or delivered, directly or indirectly, to any public or private authority, entity, political party or candidates for public office, for any of the aforementioned purposes.



4. They may not directly or indirectly offer, accept or solicit gifts when carrying out their professional activities. Be especially careful when these gifts:

- May be interpreted as an obligation or a bribe.
- May be considered as an intention to influence decision making (from us or a third party) or to avoid standards being applied.
- It is expressly forbidden to offer, grant, solicit or accept gifts from public authorities.
- Any gift contrary to this Policy should be immediately returned or, if this is not reasonably possible, brought to the attention of a superior.

The only exception to the aforementioned rule is gifts that meet the following requirements:

- They are reasonable in terms of financial value (insignificant or symbolic), frequency and quantity. Those that do not exceed a value of 25 euros shall be considered reasonable.
- They conform with common, socially acceptable, ethical and responsible business courtesies.
- They appropriately represent the corporate image in accordance with marketing policies and strategies, they do not harm said image and/or have been given to promote it.
- When it comes to invitations, these should be within reasonable limits and be reviewed and authorised by a superior.
- They are not prohibited by law or generally accepted business practices.

5. They should not finance or otherwise support, directly or indirectly, on behalf of or with the means of the Organisation, any political party, its representatives or candidates, any federation or any coalition of electors, and they should always respect legislation on the financing of political parties in force at any time.
6. They should promote and encourage awareness of this policy and the adoption of behavioural guidelines consistent with it among business associates, customers, suppliers, contractors and collaborating companies or any other stakeholders.
7. They should assess the ethical background of any natural or legal persons with whom they intend to do business in accordance with the criminal compliance due diligence procedures of the Crime Prevention Management System.



Queries or non-compliance

The entire Group has access to the Ethical Channel, through which it is possible to confidentially or even anonymously report behaviours or events that go against ethics or current legislation, with special emphasis on those that may have criminal significance.

Should you have any queries about the application of this Policy, within a reasonable time frame before entering into any kind of business relationship, consult a superior or the Ethics and Compliance Committee, which may be contacted at: ethicalchannel@intermasgroup.com.



Conflict of interest log

The Company keeps a log of all services and activities where a conflict of interest has occurred that could pose a risk for the Company and its customers. The log is held by the Ethics and Compliance Committee and the manager of the department where the conflict occurred shall be responsible for informing the Committee so it can update the log.





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