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Anti-corruption policy

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1. Introduction

The United Nations Global Compact recognises corruption as one of the most important global challenges. It is a fundamental obstacle to sustainable development that, as the Pact itself emphasizes, disproportionately affects the poorest people and communities because it corrodes the very structure of society, distorts market freedom and represents a serious legal risk for companies as well as adversely affecting their image.

Corruption poses risks to a company's reputation and increases exposure to legal, financial and other risks.

Viscofan Group, as a signatory of the Global Compact, is committed to avoiding bribery, extortion and other forms of corruption, as well as developing specific policies and programmes that provide the necessary tools to guarantee impeccable behaviour by its Group employees.

Most of the countries in which Viscofan Group operates have laws prohibiting corruption and bribery, even if this is committed outside the borders of the country in question. Any breach of these laws can result in fines for companies and jail sentences for people.

The purpose of Viscofan Group's Anti-Corruption Policy is to minimise the risk of acts of corruption of any kind by employees and third parties with which it is related, and to reinforce the Group's position in the event of any breach.

2. Scope of application

This Anti-Corruption Policy will be applied to Viscofan Group and will be mandatory for all its administrators, directors and employees.

To the extent provided by this Policy, this also affects third parties who act on behalf of Viscofan Group, or who in any way provide a service by or on behalf of each Viscofan Group company (such as agents, distributors, advisers, consultants or others).

3. Definitions

Corruption

Corruption consists of abusing a position or professional or other circumstances to obtain private profits that would not otherwise be obtained (financial benefits or other advantages).

Within the framework of this Policy, corruption will occur when said abuse is used to obtain some type of profit for Viscofan Group or any of the companies that comprise it, as well as for any of its employees or third parties that maintain business relationships with any Viscofan Group company.

It may be active (made by those who promise, offer or grant those benefits or advantages) or passive (those who ask for, receive or accept unjustified benefits or advantages)

Bribery

Bribery is a form of corruption consisting of offering, promising or receiving any gift, loan, fee, reward or other advantage to induce something dishonest or unlawful, or contrary to Viscofan Group's Code of Conduct or their internal regulations.

The bribe may include money, or any offer, promise, delivery or gift of any good or service of value including: entertainment gifts, services, trips, incentive programmes, approval of discounts, job offers or internships, reimbursements, illicit, unjustified or excessive commissions in relation to services rendered, or overpayments to officials, authorities, public offices or any other person with power to influence or decide, even on a one-off basis, regardless of their scope.

Extortion

Extortion is a form of bribery that is accompanied by threats that endanger the personal integrity or life of the people involved.

Facilitation payments

Payments of small amounts of money to officials, authorities, public officials or any other person with power to influence or decide, even as a one-off, regardless of their scope, in public administrations or bodies, in order to obtain, facilitate or accelerate the execution of an administrative procedure or a public service, such as to obtain health, environmental, commercial, urban or other licenses or permits; process government documents such as visas, work permits or customs clearance: provide police protection; pick up and deliver

mail; provide telephony services or supplies (gas, electricity, water, etc.); load or unload goods or any others necessary for Viscofan Group's activities.

Public official

This includes all employees, authorities, public positions or any other person at any level of a government department or agency, with the power to influence or decide, even on a one-off basis, regardless of their scope, as well as the employees of companies owned by, or under the control of, the government. This includes elected officials, customs inspectors and tax inspectors, registrars, judges, police, etc.

4. Principles

The following principles govern the Anti-corruption Policy:

Zero tolerance

Viscofan Group does not accept or authorise any form of corruption and applies a zero tolerance criterion regarding any breach of this Policy. It is committed to complying with regulations related to corruption in the countries where it operates, as well as current internal regulations in the Group at any time, in both cases in accordance with the company's spirit and purpose.

Commitment to prevention. Risks evaluation

Viscofan Group has established a dynamic model for the evaluation, supervision and monitoring of corruption risks at national and international levels, in line with the provisions of the Group's Risk Control and Management Policy.

Transparency and control

All transactions and operations carried out by Viscofan Group, both within the same Group and with third parties, must be recorded accurately and appropriately in Viscofan's books and records, in accordance with the regulations applicable in each country, the internal regulations (including the Policies on Business Expenses, Business Courtesies and Internal Control of Financial Information) and current internal control requirements.

Likewise, it is necessary to strictly comply with the internal regulations regarding drawing down funds, especially the Policy on Powers of Attorney, and those

other procedures that the Group may establish at any time in order to guarantee the adequate control thereof.

5. Content

To avoid any type of corruption in Viscofan Group, a number of guidelines are set that define the actions that are not allowed and the circumstances in which some of said actions may be allowed provided they are carried out in accordance with the provisions of other Group Policies.

- **Bribery, extortion, facilitation payments and influence peddling.** Employees of Viscofan Group must never solicit, accept, offer, attempt, provide or authorise any type of bribery or extortion, directly or indirectly, in their relations with public officials, customers, suppliers, collaborators or any other derived from their professional activity.
- **Facilitation payments.** Employees are prohibited from making facilitation payments. It is also forbidden to try to exert any influence on public officials, beyond the legal procedures provided for in the applicable regulations in each country or in the internal regulations, taking advantage of any personal relationship to ensure a resolution that can generate a profit for them or for Viscofan Group.
- **Gifts, business courtesies, promotional and marketing expenses.** Gift giving or providing business courtesies is prohibited, especially those that try to influence the decisions of a third party and/or that do not have the relevant authorisations. Only business courtesies, promotional expenses and payments to third parties that are made in accordance with the internal regulations in force at any time and, in particular, the Business Courtesies Policy, the Business Expenses Policy and the Travel Policy are allowed.
- **Donations and sponsorships.** It is forbidden to use donations or sponsorships to conceal undue payments, which are prohibited in this policy. Likewise, donations to political parties or companies linked to them are not allowed.

Hiring public officials. It is forbidden to hire public officials who have been disqualified or in any way removed from their position as a result of practices directly or indirectly related to corruption or any of the behaviours prohibited in this policy.

- **Relations with third parties.** The third parties with which Viscofan Group has business ties must also know and comply with this Policy on

corruption, as well as the protocols and provisions set forth in the Policies for Purchasing Goods and Contracting Services, and Contracting External Commercial Services and any other valid internal regulations,

6. Breaches

This document is part of Viscofan Group's internal regulations.

No user shall respond to requests, instructions or orders contrary to Viscofan Group's internal regulations, nor may they rely on them as justification for any non-compliance. It is only possible to breach the provisions thereof for exceptional duly-justified reasons such as demands by administrative, inspectorate or judicial authorities.

Any person who detects, observes or suspects a breach must inform the Group.

No employee will be demoted to a lesser position, nor will he/she be subject to sanctions or other retaliation for reporting suspicions of breach of this Policy or for refusing to pay a bribe, even when this would mean the loss of business for Viscofan.

7. Validity and modification

This document was approved by the Board of Directors of Viscofan, S.A. at its meeting on 24 January 2019 and enters into force at the time of its approval.

Viscofan, S.A. reserves the right to update and modify this document. Any updates and modifications will be duly published in accordance with Viscofan Group's Publication Procedure.