



**GANTREX**<sup>®</sup>  
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# GANTREX

## Anti-corruption and Anti-bribery policy



# Objective

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The present document is issued under the auspices of the Gantrex Group Code of Conduct as the basis for actions of those affected thereby in terms of Anti-corruption and Anti-bribery.

This Policy sets out the methodology and tools which help to prevent, identify, assess and punish, if necessary, the risk of those concerned by the document incurred in acts of corruption or bribery.

# To whom is the policy addressed?

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This Policy applies to any Group representative, its agents and third parties representing Gantrex Group. They shall all express knowledge and full acceptance of the document.

# Policy principles and Declaration

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Gantrex is not involved in any form of corruption or bribery and prohibits any act of such as a direct action or by means of third parties.

The values set out in the Code of Conduct insist on compliance with all the laws, rules and regulations that govern corruption and bribery in every country in which it operates. In almost every country in the world, corruption and bribery are being declared illegal and criminal punishments for breaking the law are serious.

It is mandatory to place the observance of ethical principles before the achievement of goals of the Gantrex Group, considering it essential to create a culture to implement and enforce the Anti-corruption and Anti-bribery policy.

This Policy extends to all commercial agreements and transactions in all the countries in which the Group or its representatives operate.

Any representative of the company suspecting or knowing of any corrupt or bribery conduct shall report it to the Ethics Committee. Gantrex Executives shall make an additional effort to promote interest within the Group in the compliance with this Policy.

Any person reporting in good faith of a Policy violation or any alleged corruption or bribery conduct, shall be protected against retaliation.

In case of identifying any corruption or bribery case, Gantrex shall immediately take corrective and preventative actions, and request, where applicable, legal advice to dismiss the employee involved or refer the matters to the competent authorities as prescribed by Law.

# Policy principles and Declaration

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## 1 What is bribery?

Bribery is the act of giving, proposing, promising or receiving any item of value in exchange for an undue benefit or advantage, or as compensation for performing or omitting an action inherent to a public or private service, regardless of whether the offer, promise or request is for oneself or for a third party, or in the name of such person or a third party.

It is understood that providing a payment or any other advantage to any person or entity not fully and properly stated in the business contract terms, constitutes bribery.

## 2 What is corruption?

Corruption includes the solicitation of a bribe, whether a refusal thereof includes a threat or not.

## 3 Rules about accepting gifts, hospitality and expenses

The purpose of gifts, courtesies or other entertainment activities is to create a good and solid working or commercial relationship. The purpose shall never be to obtain or gain an unfair advantage in a relationship. Gantrex prohibits receiving even a reasonable amount for meals, travel, accomodation, etc., for a corrupt purpose or for the obtaining of an undue advantage.

This policy acknowledges that invitations to meals, courtesies or entertainments, and, in specific circumstances, modest or symbolic gifts are part of the gratuities ethos in business.

The following conducts shall never be permitted:

- To accept and receive gifts from third parties, clients or suppliers in cash or cash equivalent.
- To accept gifts, invitations, courtesies or other objects of value that may seek to exert influence or obtain a material effect on any (potential or real) business transaction of Gantrex, or that may lead to a conflict of interests.
- No employee or close person shall directly or indirectly accept any amount of money, gift or invitation intended to influence actions or decisions related to Company businesses or which could make a third party think of benefiting or gaining advantage therefrom.

#### **4** Rules about giving gifts, hospitality and expenses

Gifts, expenses and hospitalities shall have a modest or symbolic value, by themselves or as part of the gifts and courtesies for the same recipient.

They shall not be provided to exert undue influence on a third party, on actions and/or decisions or to obtain a commercial advantage for the Group.

The following conducts shall never be permitted:

- Gifts, invitations, courtesies or other objects of value given to third parties, clients or suppliers to obtain something in exchange.
- Gifts, invitations, courtesies or other objects of value for persons involved in a public or private bidding process in which Gantrex is taking part.
- Any cash or cash equivalent gift.
- Frequent gifts, invitations or courtesies for the same person or organization.
- Gifts, invitations, courtesies or other objects of value considered as excessive or extravagant, inappropriate or which could negatively affect Gantrex's reputation.

Gifts and courtesies shall be handed over in the name of Gantrex, not as individuals.

# Reporting mechanisms

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The Ethics Committee is in charge of receiving queries, complaints and reports of alleged violations of the Anti-corruption and Anti-bribery Policy by the means set forth in the Code of Conduct. The information provided by the plaintiff shall be kept strictly confidential to the extent permitted by law in each particular case.

Gantrex shall not admit false or reckless allegations or complaints. If it becomes apparent that the report was not made in good faith, such report shall be considered a violation of the Gantrex Group Code of Conduct.

# Penalties

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Penalties for violating National or International regulations or Anti-corruption and Anti-bribery Standards may lead to severe penalties for company representatives and Gantrex Group itself.

Addressees breaching this Policy shall be subject to penalties and disciplinary measures, including fair ground dismissal. Gantrex shall apply disciplinary measures fairly, promptly and proportionally to the damage caused.

# Disclosure

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The disclosure of the Anti-corruption and Anti-bribery Policy shall be carried out through integration in the group intranet.

All the addressees shall receive a copy of this Policy and sign all the pages; Gantrex shall keep a signed and scanned copy thereof.

# Entry into force

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This Anti-corruption and Anti-bribery Policy shall enter into force as of **January 1st 2017**

Document owner: Alberto Beraza

Version history:

Rev	Date	Author	Comment
0.1	01/01/2017	A. Beraza	First Draft