



# Anti-Corruption Policy

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## CONTENTS

<a href="#">1. INTRODUCTION</a> .....	3
<a href="#">2. PURPOSE, SCOPE AND DEFINITIONS</a> .....	3
<a href="#">2.1. PURPOSE</a> .....	3
<a href="#">2.2.SCOPE</a> .....	3
<a href="#">2.3. DEFINITIONS</a> .....	3
<a href="#">3.ANTI-CORRUPTION MEASURES</a> .....	5
<a href="#">3.1. BUSINESS CORRUPTION, BRIBERY, TRADING IN INFLUENCE, EXTORTION, SUBORNATION AND FACILITATING PAYMENTS</a> .....	5
<a href="#">3.2. ADVANTAGES TO CERTAIN THIRD PARTIES</a> .....	5
<a href="#">3.3. SPONSORSHIPS AND CORPORATE ACTION AND INVESTMENT</a> .....	5
<a href="#">3.4. TRAVEL AND REPRESENTATION EXPENSES</a> .....	5
<a href="#">3.5. ACCOUNTING RECORDS AND DOCUMENTATION</a> .....	5
<a href="#">3.6.RISK SUPPLIERS</a> .....	6
<a href="#">4.POLICY APPROVAL</a> .....	6
<a href="#">5. RESPONSIBILITIES ARISING FROM THE POLICY</a> .....	6
<a href="#">6.POLICY REVIEW:</a> .....	6
<a href="#">7.POLICY BREACHES</a> .....	6



## 1. INTRODUCTION

Grupo Cooperativo Cajamar (hereinafter referred to as the Group) is fully committed to complying with existing legislation and is aware of the importance of the fight against corruption, in which private sector entities must intervene.

In this regard, the Group subscribes to the United Nations Global Compact and undertakes to comply with the principles it establishes, including number 10, which states: *Businesses should work against corruption in all its forms, including extortion and bribery*

Corruption practices, including extortion and bribery, can trigger significant reputational costs for institutions, as well as significant sanctions for both those who practice them and those who consent and protect them. The Group is therefore aware of the importance of combating these illicit practices, which clearly harm both the organisation and society as a whole.

So, the Group is committed to maintaining a position of **zero tolerance against corruption** in all its forms.

## 2. PURPOSE, SCOPE AND DEFINITIONS

### 2.1. PURPOSE

The objective of this policy is to lay down the institutional position of the Group and establish guidelines for action in order to prevent any persons included within the scope of this policy from engaging in different behaviours contrary to existing legislation on the matter to which the Policy refers.

### 2.2. SCOPE OF APPLICATION

This Policy shall apply to all members of the administrative bodies, directors, employees and agents of each and every one of the entities that make up the Group. They all have the duty to know and abide by this Policy.

The Group shall also promote compliance with the principles and values set out in this Policy among its subsidiaries and in its contractual relationships with members and suppliers. Such contractual relationships may be subject to compliance with the aforementioned principles and values.

### 2.3. DEFINITIONS

1. Corrupt practices refer to those contained in the Criminal Code, approved by Organic Law 10/1995, of 23 November, such as **corruption in business, bribery, trading in influences and extortion**. Such practices are defined in the Code as follows:

a) Corruption in business:

- The manager, director, employee or collaborator of a business undertaking or a company who themselves or through an intervening person receives, requests or accepts an unjustified benefit or advantage of any kind, for themselves or for a third party, as consideration for unduly favouring another in the acquisition or sale of goods, or in the contracting of services or in commercial relations.
- Those who, themselves or through an intervening person, promises, offers or grants to directors, managers, employees or collaborators of a commercial undertaking or a company, an unjustified benefit or advantage, of any nature, for themselves or for third parties, as consideration for unduly favouring them or a third party against others in the acquisition or sale of goods, the contracting of services or in commercial relations.
- Those who, by offering, promising or granting any improper pecuniary or other benefit or advantage, corrupts or attempts to corrupt, either themselves or through an intervening person, a public authority or official for the benefit of themselves or a third party, or responds to their requests in this regard, for the purpose of acting or refraining from acting in



connection with the exercise of public functions to obtain or retain a contract, business or any other competitive advantage in the performance of international economic activities.

b) Bribery:

- A public authority or official who, for their own benefit or for a third party, receives or requests, either themselves or through an interposed person, a gift, favour or remuneration of any kind or accepts, offers or promises to perform in the exercise of their office an act contrary to the duties inherent in it or not to perform or unjustifiably delay the performance of said duties.
- A public authority or official who, for their own benefit or for a third party, receives or requests, either themselves or through an interposed person, a gift, favour or remuneration of any kind or accepts, offers or promises to perform an act inherent to their office.
- It shall also be classed as bribery when any of the conducts described in the two preceding points is carried out by jurors, arbitrators, mediators, experts, administrators or auditors appointed judicially, insolvency administrators or any persons participating in the exercise of public service.
- A private individual who offers or delivers a gift or remuneration of any other kind to an authority, public official or person participating in the exercise of public service for the purpose of performing an act contrary to the duties inherent to their office or an act inherent to their office, not to perform or to delay the performance of their duty, or in consideration of their position or function.

c) Trading in Influence:

- A public official or authority influencing another public official or authority by exercising the powers of their office or any other situation arising from their personal or hierarchical relationship with the latter or with another official or authority to obtain a resolution that may directly or indirectly generate an economic benefit for themselves or a third party.
- Any individual who influences a public official or authority by taking advantage of any situation arising from their personal relationship with the latter or with another public official or authority to obtain a resolution that could directly or indirectly generate economic benefit for themselves or for a third party.
- Those who, offering to perform the behaviours described in the two previous sections, request from third parties gifts, presents or any other remuneration, or accept such an offer or promise.

d) Extortion: Those who, for profit, compel another person, through violence or intimidation, to perform or omit a legal act or business to the detriment of that person's property or that of a third party.

2. Subornation and facilitating payments shall also be regarded as corrupt practices in the broad sense, as defined in the following terms:

a) Subornation: Act of corrupting or being corrupting in exchange for gifts to get something.

b) Facilitating payments: Small, unofficial, improper payments made to a public official or to employees of a private company to obtain or expedite a process, obtain a license or other type of service.

3. Finally, for the purposes of this policy, the term **gifts** refers to advantages, presents, benefits, favours, remunerations, offerings, promises, grants, compensation, free-of-charge arrangements and donations, whatever their nature, direct or indirect, and their characteristics.

### 3. ANTI-CORRUPTION MEASURES

#### 3.1. CORRUPTION in BUSINESS, BRIBERY, TRADING IN INFLUENCE, EXTORTION, SUBORNATION AND FACILITATING PAYMENTS



The conduct or actions referred to in paragraph 2.3 above on corruption in business, bribery, trading in influence, extortion, subornation and facilitating payments are strictly prohibited.

Consequently, gifts will not be given or accepted either directly or indirectly, including actions through third parties, which give rise to any of the corrupt practices set out in the previous paragraph. The following shall not be considered as such, unless, by reason of their frequency or characteristics, they can be interpreted by an objective observer as being intended to affect the impartial judgement of the recipient:

- a) Low-value propaganda objects;
- b) Normal invitations not exceeding the limits considered reasonable in terms of customary corporate hospitality;
- c) Occasional items for specific and exceptional reasons (such as Christmas gifts), provided that they are not in cash and are within reasonable limits;
- d) Invitations to sporting or cultural events that do not exceed the limits considered reasonable in terms of customary corporate hospitality.
- e) Gifts made to customers during promotional campaigns, which must comply with the applicable external and internal regulations.

Any queries or questions or requests for clarification as to the extent in practice of these prohibitions and their exceptions should be addressed to the Regulatory Compliance Division ([cumplimientonormativo@bcc.es](mailto:cumplimientonormativo@bcc.es)), which will be responsible for providing the appropriate response, taking into account the circumstances of the specific case and collecting for this purpose any information required in this regard.

### **3.2. ADVANTAGES TO CERTAIN THIRD PARTIES**

The Group shall not grant improper advantages to political parties, trade unions or the media in its commercial and/or institutional relations with them.

The Group will strictly comply with regulations on the financing of political parties and their linked foundations. Debt forgiveness agreements may only be reached with political parties and/or their linked foundations when permitted by current legislation and in accordance with the Group's risk criteria.

### **3.3. SPONSORSHIPS AND CORPORATE ACTION AND INVESTMENT**

The Group shall exercise due diligence in respect of sponsorship and corporate action and investment in order to prevent corruption, bribery and extortion practices both in the relationship with the beneficiary entity and in its relationship with third parties. In addition, the Group will ensure that sponsorships and corporate action and investment are not linked to the bad practices that this Policy aims to prevent.

### **3.4. TRAVEL AND REPRESENTATION EXPENSES**

The Group shall ensure that travel and representation expenses are reasonable and that they cannot be classified as excessive or disproportionate, and that they cannot be considered to pay any benefits to facilitate the pursuit of any business.

### **3.5. ACCOUNTING RECORDS AND DOCUMENTATION**

All the Group's payments and economic transactions must be supported by the accounts and documentation, available for review by the financial control and audit mechanisms, as well as by the supervisory and tax authorities.

### **3.6. RISK SUPPLIERS**

Such consideration will be given to those who collaborate with the Group in relations with governments and authorities, as well as to those who act to engage business for the Group.

In this type of relationship, if the supplier acts in a corrupt manner, the Group could be affected both legally and in terms of its reputation, so when entering into an arrangement with this type of supplier the Group will seek to ensure they accept the contents of this Policy.



In addition, in this type of relationship, entities of recognised prestige in the market or sector concerned will be used as suppliers, especially when the remuneration of these depends on the success of the efforts made.

#### 4. POLICY APPROVAL

Approval of this Policy is the responsibility of the Bank's Board of Directors, as the parent entity of the Group.

#### 5. RESPONSIBILITIES ARISING FROM THE POLICY

- A) It is up to all the departments of the Entity, and especially the departments in charge of its business, to comply with the Policy and take any measures necessary to avoid the breach of the same.
- B) The Regulatory Compliance Division is responsible for the following actions:
- Drafting and updating this Policy in the terms indicated in section 6.
  - Any queries, questions or requests for clarification in relation to this Policy can be addressed to the Regulatory Compliance Division e-mail address ([cumplimientonormativo@bcc.es](mailto:cumplimientonormativo@bcc.es))
  - Working in coordination with the Corporate Social Responsibility Division, the general publication of this Policy.
  - Promote, in coordination and with the collaboration of the Human Resources and Corporate Social Responsibility Divisions, the dissemination and training actions deemed necessary to ensure knowledge of the Policy.
  - Together with the Audit Division, ensure compliance with the Policy, learn about breaches of the Policy and propose to the Control Committee the appropriate corrective measures and sanctions for the Committee to adopt in a coordinated and consensual way with the Human Resources Division.

#### 6. POLICY REVIEW

It is the responsibility of the Board of Directors, as the holder of this Policy, to approve any modifications made hereto.

Likewise, and by delegation of the Board of Directors, the Regulatory Compliance Division is responsible for making any amendments to this Policy that are necessary to maintain, update, improve, or adapt it, and is responsible for the decision as to whether or not to submit such modifications to the Board of Directors for its approval, in view of their scope and relevance, except in those matters which expressly require the approval by the Board of Directors, either by legal requirement or by decision of the Board of Directors.

#### 7. POLICY BREACHES

Any person who is aware of a possible breach of the Policy must communicate it through the whistleblower channel referred to in the Group Code of Conduct.

Any reports submitted will be processed confidentially, preserving at all times the identity of the sender.

If the reports come from customers, they will be processed according to the customer service channels the Group has established for this purpose.