

# *Anti-corruption and Fraud Policy*

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## **Contents**

1. Definition .....	2
2. Commitment .....	2
3. Principles.....	2
4. Responsibilities .....	3
5. Requirements and mechanisms.....	4
5.1. Complying with the Code of Conduct .....	4
5.2. Ethics channel .....	4
6. Supervision.....	5

## 1. Definition

Corruption is a complex social, political and economic phenomenon that affects all nations. Corruption undermines democratic institutions, slows economic development and contributes to government instability.

## 2. Commitment

CIE Automotive, S.A. (hereinafter, "CIE") is committed to tackling corruption by establishing principles to guide the behaviour of all individuals within the Group.

For this reason, CIE adheres to the ten principles of the United Nations Global Compact, which is a voluntary initiative undertaken by companies that commit to align their strategies and operations with ten universal principles covering four different areas, namely, human rights, labour, the environment and anti-corruption.

<http://www.unglobalcompact.org/>

Specifically and in accordance with Principle ten of the Compact, CIE **undertakes to combat corruption in all its forms, including extortion and bribery** and develop specific policies within this area.

## 3. Principles

CIE performs all activities in all areas in accordance with the prevailing legislation of the countries it operates in and as such, makes the following commitments:

- ✓ Not to influence the will or objectivity of individuals outside CIE by using unethical practices and/or practices that breach applicable law in order to obtain a benefit or advantage.
- ✓ All agreements with third parties in which a Group company has a payment obligation must be recorded in writing. The service provided must be described in detail and the agreement must be authorised by the relevant individual, in accordance with the company's systems and procedures.
- ✓ All payments made by the company must be effected by means of order cheque or bank transfer. Cash payments or bearer cheques without the corresponding receipt are not permitted. It is expressly prohibited to directly or indirectly pay fees or any other type of remuneration in order to obtain orders or acquire a commercial advantage. Excluded from the above are payments made to commercial or sales representatives operating on behalf of the company or any Group company due to a contractual arrangement. Reasonable expenses or hospitality payments that the market considers standard or normal based on their nature, frequency and amount are permitted. In any case, these types of payment must be authorised by the individual responsible for the unit in question.
- ✓ Gifts, hospitality or other advantages must not be given to public officials either directly or through third parties as an inducement to exercise influence in favour of CIE.

- ✓ Gifts and hospitality deemed to be more than purely symbolic, or that may be interpreted as an attempt to exert undue influence over a commercial, professional or administrative relationship may not be requested or accepted.
- ✓ Resources made available to CIE personnel are not for personal use, use outside work and/or for activities not directly related to CIE's interests.
- ✓ Partners, suppliers, contractors and collaborators will be made aware of and encouraged to adhere to this policy and to adopt conduct guidelines that are consistent with it.
- ✓ In order to prevent and avoid money laundering practices arising from criminal or illegal activities, special attention will be paid to events where there is evidence that the individuals or entities CIE does business with have acted without integrity.
- ✓ All CIE's actions, operations and transactions will be truthfully and appropriately reflected in its records and systems.
- ✓ CIE undertakes to act transparently and report all actions, operations and transactions accurately, clearly and comparatively.

The above commitments and behavioural guidelines are also included in CIE's Internal Professional Code of Conduct ("**Code of Conduct**"), which, without exception, is of mandatory compliance for directors, executives and employees of all CIE Group companies.

#### 4. Responsibilities

In accordance with our management model, anti-corruption principles are used in all activities. The bodies responsible for compliance in this area are:

- **Corporate Social Responsibility Committee:** Among its functions the Committee promotes the existence of the Group's Code of Conduct, which categorically prohibits any behaviour by CIE Group personnel that may be considered as being associated with corruption or bribery. It also submits the Code of Conduct to the Board of Directors for approval and subsequent modification and addresses relevant issues in order to increase awareness of and compliance with the Code of Conduct.
- **Internal Audit Department:** The Internal Audit department is responsible for ensuring that the mechanisms required to prevent and detect corrupt practices function correctly. If there is evidence of such behaviour, prevailing business procedures will be reviewed in order to improve them and prevent the occurrence of corrupt practices in future.

## 5. Requirements and mechanisms

In order to comply with this policy, there are requirements and mechanisms to prevent, detect and investigate cases of corruption.

### 5.1. Complying with the Code of Conduct

Without exception, CIE's Code of Professional Conduct is of mandatory compliance for all the directors, executives and employees of CIE Group companies.

CIE's guiding values are as follows:

1. Focus on external and internal clients and with a service attitude.
2. Respect for individuals and their ability to show initiative, creativity and innovation and to participate and work as a team.
3. Ability to meet objectives and provide added value.
4. Positive attitude towards change and continuous improvement.
5. Responsibility and integrity of individuals in their commitment to produce work of a high quality.
6. Respect for the environment, by working to minimise impact.
7. Transparency, by releasing all data pertaining to our activity into the public realm.

The Code of Conduct contains a specific section on the reliability of financial reporting, which provides a number of rules specifically intended for individuals directly involved in financial reporting.

### 5.2. Ethics channel

CIE has an ethics channel for reporting improper conduct or activities. CIE personnel can use the channel to make confidential enquiries about this type of conduct and any other issues associated with the Code of Conduct, the potential violation or non-compliance thereof and any conduct or behaviour that is either illegal or that could lead to criminal liability for legal entities.

The ethics channel operates under a protocol and rules of procedure to analyse any reports submitted and communicate them to the Corporate Social Responsibility Committee.

## 6. Supervision

The supervision of corrective measures in respect of reports submitted is reflected in the Annual Internal Audit Plan, which is approved by the Audit and Compliance Committee and shared with the Corporate Social Responsibility Committee.

The company's initiative to combat corruption covers the entire value chain and complies with the corresponding GRI indicators.