



# ANTI-CORRUPTION POLICY





## **1. INTRODUCTION**

Truck and Wheel Group, S.L. and all its subsidiaries (hereinafter, the "**TWG Group**") is aware of the importance of respecting the law in anti-corruption matters, of the importance of taking action in the fight against illicit practices and of the damage that, in the event of not having the appropriate protocols in place, could be caused both to the TWG Group itself and to the external agents with which it interacts.

Considering that the TWG Group operates in different national and international markets, it is in constant relationship with third parties in the wide variety of operations in which it is involved.

Not having the basic principles of an anti-corruption model in place to cover the main legal and reputational risks could therefore be seriously detrimental to the TWG Group.

## **2. OBJECT**

This anti-corruption policy is intended to serve as an action guide for all TWG Group professionals as well as for third parties that collaborate with the TWG Group within the framework of any relationship.

## **3. SCOPE OF APPLICATION**

This anti-corruption policy applies to Truck and Wheel Group, S.L. and all its subsidiaries (TWG Group).

## **4. APPLICATION RULES**

As previously mentioned, the TWG Group operates in different national and international markets, and is subject to compliance with different anti-corruption regulations, among which the following stand out:

- Spanish Penal Code
- U.S. Foreign Corrupt Practices Act (U.S. Foreign Corrupt Practices Act)
- U.K. Bribery Act (U.K. Bribery Act)
- United Nations Convention against Corruption



- OECD Convention on Corruption

These standards may require additional behaviors and obligations beyond those not covered by this anti-corruption policy. In case of conflict between this anti-corruption policy and local regulations, the TWG Group Compliance Committee should be consulted in advance.

## **5. PROHIBITED CONDUCTS**

The following conducts, in addition to those provided for in the laws or regulations described in the preceding section and any other applicable ones, shall constitute a violation of this anti-corruption policy:

- I. Giving, promising or offering, either directly or through third parties, any type of gift, gift, present or similar that contravenes the provisions of the following section.
- II. Giving, promising or offering bribes to third parties, either directly or through third parties and regardless of their performance in the public or private sphere.
- III. Giving, promising or offering on behalf of the TWG Group, either directly or through third parties, any type of payment intended to obtain favorable treatment in the context of administrative processes or procedures, as well as making contributions for political purposes.
- IV. Offering, promising or granting any type of sponsorship or donation in an attempt to obtain favorable treatment.
- V. Requesting, accepting or receiving any type of gift, gift, present or benefit intended to grant favorable treatment within the framework of a commercial relationship with a third party or whose purpose is to benefit or favor a third party in the acquisition or sale of goods or services.
- VI. Establish business relationships with third parties without complying with the minimum due diligence duties in the knowledge of third parties.



## **6. PERMITTED BEHAVIORS**

Notwithstanding the foregoing, the TWG Group is aware that gifts or any other legitimate form of expense or attention may occur on a regular basis as an integral part of its business relationships with its customers and suppliers.

Therefore, gifts or expenses that can be considered normal or bona fide, and provided they meet the following requirements, must be exempted from the prohibited conduct set forth in this anti-corruption policy:

1. They are made (i) on behalf of the TWG Group, (ii) on a public and not secret basis and (iii) do not include cash or cash equivalents;
2. They do not include the financing of costs of leisure activities, travel and similar expenses of accompanying persons or guests at business meetings;
3. They do not include gifts that are not in good taste or that involve attendance at places inappropriate for the development of professional relationships;
4. They are made at an appropriate time; that is, at times when no relevant decisions are being made regarding aspects that may have an impact on the relationship that the TWG Group maintains with an agent or third party;
5. They are not intended to influence the person for whom they are intended.

Prior to the delivery of the gift or expense, the professional should perform the exercise and reflect on whether his or her actions may compromise the independence and/or honesty of the recipient at the time of making a business decision.

## **7. OUTREACH TO SUPPLIERS AND COLLABORATING COMPANIES**

The TWG Group will make its best efforts to promote the application of this policy among its main suppliers and collaborators.



## **8. IMPLEMENTATION OF THE ANTI-CORRUPTION POLICY**

The TWG Group declares that it has internal bodies and procedures capable of monitoring the operation of and compliance with this anti-corruption policy.

The TWG Group may periodically require all its employees to state that they comply with the principles set forth in this anti-corruption policy.

The Group will periodically disseminate the contents of the Anti-Corruption Policy to all its employees by means of informative actions and training sessions.

## **9. APPROVAL**

This anti-corruption policy was approved by the Board of Directors on May 12, 2023.

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