



## Anti-Corruption Policy

Title of the Standard	<b>Anti-Corruption Policy</b>
Geographical scope	Global
Category	Policy
Approval Date	12 May 2023
Approving body	Board of Directors
Version	V1

# ANTI-CORRUPTION POLICY

## 1. Introduction

Truck and Wheel Group, S.L. and all its subsidiaries (hereinafter, the "**TWG**") 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, if the appropriate protocols are not in place, this could cause both to the TWG itself and to the external agents with whom it interacts.

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

Failure to have 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**.

## 2. Purpose

This anti-corruption policy is intended to serve as a guideline for all **TWG** professionals as well as for third parties who collaborate with the **TWG** within the framework of any relationship.

## 3. Scope of application

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

## 4. Implementing rules

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

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

- OECD Convention on Corruption

These rules may require additional behaviour and obligations beyond those not covered by this anti-corruption policy. In the event of a conflict between this anti-corruption policy and local regulations, the **TWG** Compliance Committee must be consulted in advance.

## 5. Prohibited conduct

The following conduct, in addition to that provided for in the laws or regulations described in the previous section and any others that may be applicable, shall constitute a breach of this anti-corruption policy:

- a) Giving, promising or offering, either directly or through third parties, any type of gift, present or similar that contravenes the provisions of the following section.
- b) Giving, promising or offering bribes to third parties, either directly or through third parties and regardless of whether they act in the public or private sphere.
- c) Giving, promising or offering on behalf of the **TWG**, either directly or through third parties, any kind of payment intended to obtain favourable treatment in administrative processes or procedures, as well as making contributions for political purposes.
- d) Offering, promising or granting any kind of sponsorship or donation in an attempt to obtain favourable treatment.
- e) Soliciting, accepting or receiving any kind of gift, present or benefit intended to grant favourable treatment in the context of a business relationship with a third party or intended to benefit or favour a third party in the purchase or sale of goods or services.
- f) Establishing business relationships with third parties without complying with minimum due diligence duties in the knowledge of third parties.

## 6. Permitted conduct

Without prejudice to the foregoing, the **TWG** is aware that gifts or any other legitimate form of expense or entertainment may occur regularly in business relationships with its customers and suppliers as an integral part of said relationships.

Therefore, it is necessary to exclude from the prohibited conduct established in this anti-corruption policy those gifts or expenses that may be considered normal or in good faith, and provided that they comply with the following requirements:

1. They are carried out (i) on behalf of the **TWG**, (ii) on a public and non-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, i.e. at times when no relevant decisions are being made on issues that may have an impact on the **TWG's** relationship with an agent or third party;
5. They are not intended to influence the person to whom they are addressed.

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

## 7. Outreach to suppliers and partners

The **TWG** will use its best efforts to promote the implementation of this policy among its key suppliers and partners.

## 8. Implementation of the anti-corruption policy

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

The **TWG** may periodically require all its employees to declare that they comply with the principles set out in this anti-corruption policy.

The Group will periodically disseminate the contents of the Anti-Corruption Policy to all its employees through information and training sessions.

## 9. Approval

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

### Version history

Version	Date	Created by	Validated by	Approved by	Description
01	12 May 2023	Debora Villecco	Regulatory Compliance Committee	Board of Directors	Version

**TWG Regulatory Compliance Committee**

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