

# **Gift policy**

## **FCC Group**

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## 0. Version control

Version	Date	Board of Directors
30 July 2019	30 July 2019	Approved by the Board of Directors, July 2019 meeting

## **GIFT POLICY**

### **FCC GROUP**

## **1. Introduction**

The usual commercial or courtesy practices may result in the delivery or receipt of promotional gifts, courtesy details or attention within the framework of applicable customs and practices.

The FCC Group not only aims to ensure strict compliance with the Law at all levels, but also intends to add an additional exemplary element that places the Group's performance beyond any risk, not only of non-compliance, but also of mere ethical questioning. Honesty and respect for legality and company rules should be a constant feature in the daily behaviour of all employees.

The Code of Ethics and Conduct of the FCC Group establishes a principle of zero tolerance in regard to bribery and corruption practices, and expressly prohibits influencing the intentions of third parties in order to obtain an advantage or favourable treatment. For this reason, it is necessary for the FCC Group to prudently regulate the practice of gift delivery and acceptance.

In this context, a large part of the Group's activity is linked to contracts tendered by Public Administrations, which highlights the need to observe rules of conduct that distance the company from any doubt regarding its ethical commitment.

In the same way, the FCC Group regularly contracts a large number of suppliers, of different types and entities, to cover its needs for goods, raw materials and services. In this regard, the FCC Group's commitment to the principles of free competition and the self-interest that its contracting processes are effective also imposes the need to maintain a professional and objective relationship with potential suppliers.

In light of these issues, the FCC Group has implemented this gifts and hospitality policy, which aims to establish clear principles relating to the granting or acceptance of gifts and hospitality by the company.

## **2. Scope of application**

This policy is applicable to all companies that make up the FCC Group, as well as to all its employees. For each country or business, more specific requirements may be introduced, if necessary or convenient, but local or sectoral specificities shall not provide exemption from the application of the principles established in this document.

### 3. General principles

For the purposes of this policy, a gift is deemed to be any object, regardless of its origin, nature or characteristics, that is delivered free of charge and voluntarily within the framework of a social relationship. Said concept of a gift includes hospitality, understood to be invitations to events and cultural or sporting gatherings, social events and holidays, meals or trips, provided they are not institutional, technical or training related.

Gifts may be delivered or received on an occasional basis provided they are a mere courtesy, are in line with the practices and customs of the business and the territory and are reasonable.

Special attention should be paid to this type of action, avoiding any circumstance that could give rise to doubts about the impartiality, objectivity or legality of the behaviour of the company and its employees.

Thus, gifts will always be granted or received in a transparent and occasional manner, without any employee of the FCC Group accepting or granting a gift that does not comply with the following principles:

- a) ***Legitimacy in its content:*** The gift that is offered or received must be legitimate in regard of its content, that is, it must not involve or include objects or activities that are prohibited by law or that may be considered inappropriate or unprofessional. In addition, all gifts given must comply with this policy.
- b) ***Legitimacy in their motivation:*** The gift must not be targeted or intended to obtain a future favour from the FCC Group to the person or entity that makes the gift or vice versa. In this regard, and to avoid doubts in this respect, when accepting or receiving a gift, those who, by coincidence or for other reasons, may be perceived externally as being associated with influencing professional decisions, will be avoided.

In any case, each FCC Group business will establish the relevant checks in relation to the delivery of gifts.

- c) ***Reasonableness:*** The gift must be reasonable and appropriate to the social conventions, customs and practices commonly accepted in the different places in the world in which the FCC Group does business. Likewise, the gift must be in proportion to the relationship between the FCC Group and the customer or supplier to which it is offered or from which the gift is received. Each business area will establish the relevant checks for the delivery of gifts.

As a general rule, gifts provided are those that have a reasonable value, understood as gifts with a value not exceeding 150 Euros, or the corresponding currency. In relation to gifts given by FCC Group employees to third parties, the limit of 150 euros is applied to the combined value of all gifts, invitations or hospitality received by the same person in a period of six months. In relation to gifts received by FCC Group employees, the limit of 150 euros is applied to the combined value of all gifts, invitations or hospitality received from the same company or entity in a period of six months.

In the case of hospitality services, taking into account the location, context and nature of the event, those that do not exceed 75 euros per person are considered to be reasonable.

Both internal and external monitoring or audits may be carried out regarding expenditure on gifts and hospitality in order to ensure proper compliance with this policy.

Gifts that involve cash, goods that are easily settled in cash or comparable alternatives may not be accepted or delivered (e.g. gift cards or discounts in physical or *online* commercial establishments). Gifts to people not forming part of the commercial relationship between the FCC Group and its clients or suppliers will not be accepted or delivered either.

Gifts cannot be granted or accepted either through a related person, meaning spouses (or analogous), ascendants, descendants and siblings.

- d) ***Unilateral nature:*** No gifts may be requested or delivered to third parties outside the FCC Group that have been previously requested.