



## ANTI-CORRUPTION POLICY

October 2021

## 1. INTRODUCTION

Pursuant to the Code of Ethics of Inmobiliaria Colonial, SOCIMI, S.A. (“**Colonial**” or the “**Company**” and its subsidiaries, the “**Colonial Group**”) and its employees are obliged to act with integrity at all times to prevent any kind of corruption. The Colonial Group wishes to manifest its rejection of any kind of corruption and fraud. This value is directly linked to the Colonial Group’s commitment to the promotion and achievement of the Sustainable Development Goals (SDGs), and more specifically SDG 16 to “*Promote just, peaceful and inclusive societies*”, and to substantially reduce corruption and bribery in all their forms before the year 2030.

In this context, Colonial’s Board of Directors approves this anti-corruption policy (the “**Policy**”) as a tool to prevent any conduct that could contravene the Law or the Company’s action principles.

## 2. SCOPE

### 2.1 Persons Subject

The persons subject to the Policy are all Colonial Group employees and executives, and the members of the Board of Directors (the “**Persons Subject**”).

The Persons Subject will be trained in order to ensure proper knowledge of the Policy, with a view to implementing an ethical culture of integrity and regulatory compliance.

### 2.2 Associated Persons

Associated persons are natural persons or legal entities with which Colonial conducts any kind of business relations, including, among others: (i) external advisors; (ii) natural persons or legal entities tasked with the delivery of goods or the provision of services; and (iii) persons providing their services through temporary employment agencies or through academic agreements (the “**Associated Persons**”).

The Company expects Associated Persons to take any measures that may be necessary or advisable to guarantee fair competition and conduct in the market.

Any engagements by the Company with respect to any of the groups included in this category must meet objective criteria.

## 3. THE POLICY’S GENERAL PRINCIPLES

The general principles governing this Policy are:

- No tolerance, condoning or involvement in any form of corruption in the course of business activity, in either the public or private sector.
- A prohibition on the perpetration of unlawful acts or actions that are at odds with the regulations in force and with the provisions of this Policy on the premise that action is being taken to the benefit of the Company, irrespective of the possible economic gains generated.

- The fostering of a prevention culture based on the principle of “zero tolerance” of corruption in all its forms, and promotion of the application of the Company’s Code of Ethics and responsible conduct by all Persons Subject.
- The fostering of an environment of transparency by means of internal channels to assist the Persons Subject in reporting any facts that come to their attention contravening the provisions of this Policy.

#### **4. ACTION PRINCIPLES**

##### **4.1 Extortion, bribery, influence peddling and facilitation payments**

The Company prohibits any conduct that may constitute corruption among individuals or relate to extortion in all its possible manifestations and any conduct that may constitute bribery or attempted bribery in relation to authorities, civil servants, individuals or companies, either directly or indirectly through an intermediary. Consequently, the provision of gifts, sums, goods, rights or any other goods or services in exchange for authorities, civil servants, individuals or companies taking or failing to take whatever action they are obliged to take or taking any other unlawful action is prohibited.

Requesting or receiving any unwarranted commissions, payments or benefits from third parties is also prohibited.

Moreover, there is a prohibition on: (i) any kind of activity which may constitute influence peddling; and (ii) any facilitation payment<sup>1</sup> in any format or modality that these parties may adopt.

Any suspicious actions in this regard must be reported immediately to the Compliance Unit through the corporate whistleblowing channels in place.

##### **4.2 Gifts**

The direct or indirect acceptance of any gift and of any amount the purpose of which is to induce the Person Subject to give direct or indirect priority to the person or organisation making the gift in the contracting of goods or services is prohibited.

For the acceptance of gifts:

- (i) The value of the gift may not exceed €250, and must be accepted by social usages and in accordance with industry standards.
- (ii) On an exceptional basis, in the case of gifts which exceed this amount of €250, authorisation may be requested from the Compliance Unit in circumstances which so justify.

The acceptance of gifts in any of the following circumstances is expressly prohibited:

- (i) The gift is from authorities or civil servants.
- (ii) The gift is from persons or companies when they are involved in supplier tendering processes with any of the Colonial Group companies, provided the Person Subject is involved in the tendering processes or may exert an influence over them.

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<sup>1</sup> Facilitation payment is any small payment or gift made to a civil servant or employee of a company with the intention of obtaining a favour (i.e. obtaining permission).

(iii) The gift is made in cash or in an equivalent format, irrespective of the amount.

Invitations to events carried out by suppliers or third parties must be proportionate to the circumstances and in accordance with industry standards, and under no circumstances may they give rise to the assumption that remuneration is being provided for any service other than the service itself.

The Company may only offer gifts accepted by social usages and in accordance with industry standards, by way of a kind gesture or as a courtesy. On an exceptional basis, authorisation may be requested from the Compliance Unit in circumstances which so justify.

#### **4.3 Relations with political and official institutions**

In all circumstances, the Company will observe strict compliance with national legislation in relation to the financing of political parties. In this regard, donations to political parties and their related foundations are prohibited.

Colonial will operate its business model with no interference or participation in the political processes of countries and communities in which it carries out its activities. Any relationship between Colonial and governments, authorities, institutions and political parties will be based on the principles of legality and political neutrality.

#### **4.4 Sponsorships**

The term sponsorship refers to any agreement by which the Colonial Group provides financial assistance (or other types of assistance) for an organisation or a legal entity or a specific initiative, in exchange for promoting, directly or indirectly, the name of the Colonial Group as a sponsor of its activities.

Every effort will be made to guarantee the strategic alignment of sponsorships and the implementation of appropriate procedures to this end.

The Chairman of the Board of Directors and the CEO will be tasked with decisions concerning sponsorship amounts and sponsorship activities.

An annual report will be submitted to the Board of Directors on the sponsorships carried out in the course of the fiscal year, as applicable.

#### **4.5 Donations**

The term donation will be understood as any voluntary contribution (monetary or non-monetary) made by the Colonial Group to an organisation or a legal entity, without seeking to receive anything in return, for the sole purpose of participating and contributing to the activities of the donee, i.e. without expecting any benefit in return.

Donations must be justified by the activity of the Colonial Group, and must be in accordance with the lines of action established by the Company and/or with its ESG commitments.

The Chairman of the Board of Directors and the CEO will be tasked with decisions concerning donations and the amounts allocated to them.

An annual report will be submitted to the Board of Directors on the donations made in the course of the fiscal year, as applicable.

## **5. WHISTLEBLOWING CHANNEL**

In order to facilitate compliance with codes of conduct, the Company has a confidential whistleblowing channel which may be used to voice any doubts concerning their interpretation or practical application, and to report any breaches.

The [Whistleblowing Channel](#) is available to all persons stipulated in the [Whistleblowing Channel Policy](#).

Reports will be resolved by means of a rigorous, transparent and objective procedure, and the confidentiality of the party reporting will in any case be safeguarded. The Company will not tolerate any reprisals against those who, in good faith, report facts, situations or circumstances that could constitute conduct prohibited by Colonial's Code of Ethics or this Policy. To this end, the Company will constantly strive to bring communication channels into line with best practices.

## **6. POLICY MONITORING**

The Compliance Unit, alongside the Internal Auditor, will regularly inform the Audit and Control Committee, at least once a year, to enable it to assess the application and implementation of this Policy.

Failure by the Persons Subject to comply with the provisions of this Policy will entail the exercise of disciplinary authority by the competent internal bodies.

## **7. TERM OF VALIDITY AND PUBLICITY**

This Policy will remain in force unless the Company's Board of Directors approves any amendments thereto.

This Policy will be publicised by means of the Company's corporate web page, and it will therefore be available to all Persons Subject and Associated Persons.

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*October 7<sup>th</sup>, 2021*