

Gifts and hospitality treatment policy



Prepared	Revised	Approved
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CHANGE HISTORY

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13/06/2023	Rev. 0	Luis Ruiz Ortega	Rafael Rodriguez Rosas	María Nuria García
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1 Purpose (Scope).

This **gifts and hospitality policy** (hereinafter, the “*Policy*”) develops certain aspects of the criminal risk prevention policy and links to the ethical values of **QUANDUM AEROSPACE S.L.** (hereinafter “*Quandum*” or the “*Company*”) defined in its *Policy* and other internal regulations of regulatory compliance.

This *Policy* considers not only the interests of *Quandum*, but also the needs and expectations of its employees, customers, partners, suppliers, business partners, non-governmental organizations, local communities and those of society as a whole (in hereinafter, the “*Stakeholders*”).

QUANDUM actively fight against and emphatically condemns any corrupt practice that, in addition to contravening any applicable legal provision, is contrary to its ethical principles and values related to the aforementioned internal regulations.

2 Area of application.

This *Policy* is mandatory and of global and direct application in *Quandum* and binds all its staff, regardless of the position and function performed.

This *Policy* is also mandatory for natural and/or legal persons related to *Quandum*, in that which is applicable to them, who, where appropriate, must assume a written commitment to comply with it.

This *Policy* will be available to all employees and will be provided to *Stakeholders* that require it. Likewise, it will be notified to all its directors, senior managers and any person representing the Company, when the nature of their relationship so requires.

This *Policy* is attached, as an appendix, to the “WELLCOME MANUAL” in accordance with the commitment to the quality and ISO9100 certification.

3 Policy content.

3.1 General principles.

Through this *Policy*, *Quandum* intends to ensure that all its employees, as well as the third parties with whom it maintains business relationships, comply with the provisions of the main anti-bribery regulations existing in the markets in which it is present. For this reason, this *Policy* endorses the standards established in the ISO37001 standard, on anti-bribery management systems and in particular with regard to:

- Entertainment and hospitality gifts
- Political or charitable donations

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- Public travel
- Promotion expenses
- Sponsorship
- Training
- Club memberships
- Personal favors

In accordance with the requirements and rules contained in *Quandum's* internal regulations and, in particular, in its compliance policy and its code of ethics, it will be the responsibility of the compliance officer to ensure the proper application of this *Policy*. Breaches of this *Policy* will be managed in the manner provided in section 3.4.

3.2 Gift and hospitality concept.

For the purposes of this *Policy*, a gift is understood, in the context of commercial relations, as any value that is delivered or received in an open and transparent manner, as a symbol of gratitude.

Hospitality is understood, for the purposes of this *Policy*, as any attention, generally of a social nature, that is offered or received in the context of commercial relations.

3.3 Allowed gifts and hospitalities.

Quandum employees may only accept or offer gifts or hospitality when the following requirements are met:

- 1) That they are in accordance with the applicable laws. (Government, Local, Company)
- 2) That they are not carried out with the intention of influencing third parties or to obtain any undue benefit from them.
- 3) That they are not carried out with the purpose of obtaining or maintaining a certain business or a business advantage.
- 4) The purpose of which is not to obtain or exchange favorable treatment.
- 5) That they are offered or received in an open and transparent manner.
- 6) That they cannot give rise to conflicts of interest.
- 7) That they do not have a value greater than **100 euros** or its equivalent in local currency (either in isolation or jointly between various gifts or hospitality offered/received in a period of one year to a single recipient, whether legal or natural person).
- 8) That they are not cash gifts, gift cards or any other support that allows the transmission of money, which are expressly prohibited.

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- 9) That they are not offered to public officials, except for those gifts and hospitality of low value that are proportional and reasonable according to local practice, delivered sporadically for legitimate and socially acceptable interests.
- 10) That they do not contravene, in any other way, what is established in the Code of Ethics.

Any gift or hospitality received that contravenes the above must be immediately returned or rejected, notifying the *Quandum* Compliance Officer of this circumstance. If it is not reasonably possible to return the gift or hospitality, it will be delivered to the person in charge of the Communications Department who, after issuing the corresponding receipt, will use it for purposes of social interest or lottery among employees.

In any case, the usual practices regarding gifts and hospitality must be adequately monitored, evaluated and recorded by *Quandum*.

3.4 Communication of non-compliances.

Any breach of this Policy, as well as any doubt that may arise as a result of its application or interpretation, must be communicated to the person in charge of compliance control (Compliance Officer) directly or through the ethical communication channel. *Quandum* provides an anonymous email to notify: Canal.etico@quandum.com

The Compliance Officer may act on its own initiative or at the request of any employee, supplier or third party with a direct relationship and legitimate commercial or professional interest, through a complaint made in good faith. In any case, the information transmitted through this channel is confidential, as well as the identity of the communicators in good faith.

3.5 Policy monitoring.

The Compliance Officer has the monitoring compliance *Policy*.

- The monitoring of the *Policy* includes
- *Policy* implementation
- Report irregular activities
- Periodic reviews of the effectiveness of employee training,
- Certifications, reports and records of the bribery attempts
- Review of the adequacy of *Quandum's* Integrity Policies with current laws.

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3.6 Action of Monitoring.

The Compliance Officer will investigate the allegations or complaints reported regarding acts of corruption that involve *Quandum* or its investee entities, or that are in any way connected with them, leaving documentary evidence of all this.

As a result of said investigations, Quandum will determine the actions to be taken, including possible disciplinary actions against employees, the cessation of commercial relations with third parties, and/or their report to the competent authorities.

Compliance with ethical norms and standards commits all the Companies included in the subjective scope of this *Policy* and constitutes a strategic objective for it. Therefore, all Quandum employees must know and respect the content of this Policy. Likewise, and with respect to third parties with which *Quandum* maintains business relationships, they are expected to develop behaviors aligned with it.

This *Policy* will be reviewed at least once a year and as many times as necessary to adapt it to the regulations that affect it, as well as to uses and customs.

The ownership and responsibility for the preparation and maintenance of the Gifts and Courtesies *Policy* resides with the Compliance Officer, who will be responsible for publishing and disseminating the content of said Policy to all the areas involved.

The Gifts and Courtesies *Policy* is subject to the prior approval of the *Quandum* Administration.