

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

CORRUPTION



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TABLE OF CONTENTS

Purpose	Page 1
Scope	Page 1
Definitions	Page 1
Consistency	Page 2
Responsibility	Page 2
Duty to Report	Page 2
Transparency and Legality	Page 3
Board of Directors and Responsibilities	Page 3

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Bribery and corruption are criminal offences which affect both those who actively and passively participate in committing these acts, affecting the reputation of the companies they represent and resulting in heavy fines.

PURPOSE

The Anti-Corruption Policy is intended to publicly declare the company's commitment to ethical and transparent action with its stakeholders and to conduct its business in a responsible way by acting with a "zero tolerance" philosophy towards actions that contravene its organisational principles.

SCOPE

This policy applies to all of Plus Felt's employees, as well as to customers, suppliers, subcontractors and in general to all those with whom a direct or indirect commercial, contractual or cooperative relationship is established.

DEFINITIONS

- Corruption: this is understood to be any action, through a deliberate attempt or omission to obtain a benefit for the person or for third parties to the detriment of organisational principles, regardless of the financial effects on companies.
- Bribery: this consists of offering, promising, giving, accepting or requesting compensation, whether economic or otherwise, for the purpose of obtaining a commercial, contractual, statutory or personal advantage.
- Facilitation payments: are a form of bribery carried out for the purpose of expediting or facilitating the performance of a routine governmental action by a public official.

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY**CONSISTENCY**

As collaborators, regardless of our rank or hierarchical position in the Organisation, we are all known for acting in accordance with institutional principles and practices and we will set an example through our behaviour. No collaborator may directly or indirectly engage in, conceal, sponsor acts of corruption or bribery with local or foreign public or private entities.

RESPONSIBILITY

Any reported or detected act that has any kind of relationship to corrupt practices or bribery, whether with public or private entities, shall be carefully investigated, documented and analysed by the competent bodies.

Any situations which effectively correspond to acts of corruption or bribery, will result in disciplinary action, regardless of the amount involved, the characteristics or hierarchical position of those responsible, always being in proportion to the facts and guaranteeing due process.

DUTY TO REPORT

All of the company's collaborators, as well as related third parties, especially those with whom commercial or contractual relationships are established, are obliged to inform the Administration of any facts or circumstances that may be considered as acts of corruption or bribery.

The different institutional channels of the companies can be used to do this, such as the immediate supervisor, the manager of the respective department or the internal audit manager.

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY**TRANSPARENCY AND LEGALITY**

All the acts or circumstances that are detected and verified will be reported according to the information protocols established with the different stakeholder groups and always respecting the company's officials appointed for these matters, guaranteeing transparency, legality and the balance of the reported information.

BOARD OF DIRECTORS AND RESPONSIBILITIES

The Board of Directors will define the company's anti-corruption policy and keep it up-to-date in accordance with periodic reviews resulting from recommendations from management or internal auditors.

Internal auditors are responsible for overseeing the implementation and adoption of anti-corruption and anti-bribery principles and practices within the company.