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# **Anti-Corruption Policy**

## **Lecta**

January 2021

Lecta's Anti-Corruption Policy contains a description of behaviour to be avoided and the key elements, both human, organisational and documentary, Lecta applies to prevent corruption offences occurring in all areas of the company, national and internationally.

Actual and effective implementation of prevention and control measures provided for in the policy are implemented at all levels, to ensure that this self-regulation system achieves the avoidance of any behaviour that could jeopardise the Group's reputation in the market and the value of its tangible and intangible assets.

## 1. ANTI-CORRUPTION PRINCIPLES:

- **Proportionality:** anti-corruption standards shall be appropriate to the activity carried out by Lecta and mitigate the risks that are or may be generated on this matter.
- **Senior Management commitment:** senior management shall be involved in the enforcement and development of the anti-corruption standards to be established.
- **Risk assessment:** any corruption risks detected on corruption in line with Lecta's activity shall be identified, analysed and mitigated.
- **Due Diligence:** Due Diligence processes shall be carried out before and during business relationship with third parties to avoid corruption risks.
- **Communication (training):** all Lecta's anti-corruption standards shall be made available to all its personnel.
- **Monitoring and review:** all anti-corruption standards shall be reviewed and amended, as appropriate, on a regular basis.

## 2. LECTA'S COMMITMENTS

**Public corruption** - Lecta bases its relationship to the public sector (at national and international level) on transparency and equal opportunities principles. Lecta rejects any action based on an unlawful act aimed at obtaining an unjustified profit or advantage over competitors on the market or on public contracts.

**Private corruption** - Lecta bases its actions in all markets, both domestic and international, and relationship to its customers, suppliers and competitors, on free competition and equal opportunities principles. Lecta rules out any action based on an unlawful act aimed at obtaining an advantage in the markets or contracts with its customers and suppliers.

**Relationship with political parties** - Lecta is allowed to establish relationships with political parties as long as those are made within the framework of the legal system of the countries in which it operates and complying at all times with national laws on political parties financing. No donations may however be made to political parties or foundations linked to them. Similarly, no purchases may be made of products or services the profits of which are intended directly or indirectly for a political party.

**Donations, funding, sponsorship and patronage** - Lecta shall implement a protocol to verify the actual destination of the funds before carrying out any of the following activities: donation, participation in an individual or collective funding project, sponsorship, patronage, participation in any other social, cultural, scientific, charitable, sporting or similar project.

**Conflict of interests** - Lecta's employees at all levels shall be required to avoid situations of conflict of interests. They shall refrain from performing any acts that may be influenced by a conflict of interests.

**Gifts, presents, hospitalities, invitations and business incentives** - Customers, suppliers and collaborators may be awarded gifts of low economic value, provided that the requirements established in the anti-corruption policy are fulfilled (they must be moderate and reasonable, justified and approved by the relevant body). Gifts to officials, senior managers or bodies belonging to the Public Sector shall however not be allowed.

**Commercial samples and promotional deliveries** - Samples of products may be delivered to customers, potential customers and distributors in order to assess their quality and usefulness. Promotions and competitions may be carried out to encourage the purchase or procurement of Lecta's products or services, as long as legislation in force and the internal regulations are complied with.

**Facilitation or procedural payments** - In the case of introduction, marketing or establishment in foreign countries, no payments or gifts may be made to public officials of such countries in order to facilitate an administrative procedure, obtain an import licence or permit or any other service.

**Travel and representation expenses** - Travel and representation expenses must be moderate and reasonable, meet the requirements for justification, approval and levels of authorisation laid down in the internal rules governing this matter. Under no circumstances must they be used to reward or compensate the beneficiary or a third party.

**Control of cash and recording of payments** - No cash shall be used for payments made by Lecta. Where the use of cash is necessary, a detailed record of the payments made shall be kept. No payment or collection shall be made to or from natural or legal persons other than those justified by an invoice.

**Suppliers, distributors, agents, external collaborators, joint ventures and alliances** - Lecta shall establish control over the companies with which it usually cooperates and establishes agreements. Such controls shall be proportionate to the level of risk they pose of a corruption offence and the possibility that such risk may extend its effects to Lecta and/or its subsidiaries.

**Mergers and acquisitions** - Lecta shall carry out Due diligence investigations prior to any merger or acquisition transaction, when applicable, by the company's Board of Directors.

### **3. GUIDELINES AND INVESTIGATIONS OF THIRD PARTIES**

The guidelines for the identification and investigation of third parties (Due Diligence), within the framework of the Prevention and Control Model and the Anti-Corruption Policy shall apply both to natural and legal persons, before establishing or while maintaining a relationship and shall allow Lecta to develop action plans to eliminate or mitigate the main risks detected.

Lecta shall take due care to ensure efficient and homogeneous implementation of risk analyses and assessments are carried out at all levels when third parties are or will be involved in business relationships.