

# INDUSTRIAS TAPLA S.L.



## ANTI-CORRUPTION POLICY

IATF 16949

ISO 9001

ISO 14001

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	<b>ELABORADO</b>	<b>REVISADO</b>	<b>APROBADO</b>
<b>Position</b>	Responsible SIG	Steering committee	Steering committee
<b>Date</b>	01/07/2017	01/07/2017	01/07/2017

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## CHANGE CONTROL

Nº Ed.	Date	Summary of Changes

### 1. ANTI- CORRUPTION POLICY INCLUDING EXTORTION OR BRIBERY

Within an evolving international legal framework and due to a quick development of government rules in the business world, it is necessary to develop internal anti-corruption measures.

Industrias Tapla, following the 10th principle of the United Nations Global Agreement of June 24, 2004, promotes this anti-corruption, extortion and bribery from its staff members, suppliers and subcontractors.

Industrias Tapla policy is based on the fact that no Tapla associate will offer, make, or agree to receive or accept improper payments or any consideration to anybody or from anybody in order to get dishonest or illegal purposes in the behavior of the company's management or in his Own private benefit

This is not only a cultural commitment of Industrias Tapla, but It is also a moral duty and a legal requirement. Bribery is a crime and acts of corruption expose the company and its collaborators to a process of risk, fines or judicial orders, as well as the company`s loss of Prestige.

### 2. IT WILL BE CONSIDERED CORRUPTION OR BRIBERY

#### 2.1-General

- Offer, pay or give something of value to a third party in order to obtain a business or private benefit.
- Receive anything of value in exchange for the award of contracts or orders.
- Using illegal or inappropriate means such as bribes, favors, blackmail, financial payments, offering rewards to influence the actions of others.
- Ignore or not to report any bribe proposal.

Employees should use common sense and judgment when deciding whether any act could be considered as acorrupt or inappropriate act.

#### 2.2- Facilitation payments:

Payments given to public or business people to speed up paperwork are prohibited

### 2.3- Contributors

Industrias Tapla employees have to ensure that a contracted third party will not make, offer or ask inappropriate payments on behalf of Industrias Tapla. The contracted third parties will be informed with the delivery of information regarding to this policy so they can make proper use of it, following and passing the indications to its personnel, associates or suppliers.

### 2.4-Gifts, entertainment and hospitality

This includes the reception or offer of gifts, food or souvenirs of gratitude regarding to issues related to Tapla. These activities are acceptable if they are within the limits of fair value and occurrence.

It is not acceptable:

- A favor or gift to get something in return.
- Cash gifts are forbidden

In general it is acceptable:

- Simple or informal meals in which you do business.
- Gifts considered advertising or campaigns at times such as Christmas, as long as they are from symbolic value and such value can not lead to misinterpretations and also because of this amount it can't be considered receiving something in return.

### 2.5- Political donations

Donations can not be given to a political party, public worker or a candidate for a political charge, as well as to allow the use of facilities or resources of the company.

## 3. COMPLIANCE

No violation of this policy will be tolerated, if this policy is broken, Industrias Tapla will take the proper measures, taking into account the seriousness of what has happened.

## 4. REPORT ON BRIBERY AND SUSPICIOUS ACTIVITY, IRREGULARITY REPORTING POLICY

If any breach of this policy is known, it must be reported to the management committee by email or by telephone (+34 93 843 80 40). The reports will be treated confidentially and anonymously.

Such complaints will be investigated and if it is necessary, appropriate measures will be taken.