

# Bribery, Corruption and Conflict of Interest Prevention Policy



## Purpose

The purpose of this policy is to **detail the principles of action in those situations in which, due to the professional environment, we have to offer or receive gifts, attentions or attend or organize events**, or situations in which we may encounter or appear to encounter **a conflict of interest with our customers, suppliers, other employees, or other stakeholders**.

The risks of spending on gifts, hospitality, and events do not stem from the expense itself but from circumstantial factors and disproportionality, and the same activities may be used to conceal illegal payments or benefits and conflicts of interest.

This Policy **was created as an extension of the regulatory framework established by the Code of Ethics and Conduct and in line with Principle No. 10 of the United Nations Global Compact** to which we adhere and which includes the fight against corruption in all its forms, including extortion and bribery, fraud and embezzlement.

## Our Commitments

- **Prohibit bribes and any attention or gift that may give rise to a suspicion of corruption**, or is intended to influence, directly or indirectly, the will or objectivity of outsiders to obtain any benefit or advantage through the use of unethical practices and/or contrary to applicable law.
- **Undertake not to give, promise or offer, directly or indirectly**, any property of value to any natural or legal person, for the purpose of obtaining undue advantage.
- **Do not allow any facilitation payments to public officials** or cash payments to any third party.
- **Not finance or show support or advocacy of any other kind, directly or indirectly, to labor unions, public officials, political offices, political parties**, their representatives and/or candidates, advisors, as well as any person who performs public functions or is trusted personnel of the aforementioned.
- **Not use donations, sponsorships, or any type of financial assistance** to cover up improper payments. The granting of any of the above to an external entity must be carried out in an honest and transparent manner in accordance with the principles of the Code of Ethics and Conduct and the applicable legislation. Cepsa is committed to making these concessions only to entities with integrity that can account for applying the benefit received.
- **Not request or receive unduly, directly or indirectly, commissions, payments, or benefits from third parties** for the operations we carry out.
- **Communicate**, on the part of employees, that they are faced with a potential or actual conflict **in accordance with established procedures, refraining from taking any action or making any decision in relation to the same**.
- **Respect the right of employees to participate in legitimate financial activities outside the work environment** and to engage in other professional activities on their own account or for others, as long as it does not affect the performance of their work, there is no exclusivity agreement and it does not represent a conflict of interest.
- **Prohibit the use of its name as a platform to promote outside interests**, business or otherwise, or to benefit immediate or close friends or family.
- **To reflect faithfully, completely and at the appropriate time all our actions, operations and transactions** in our books and records.
- **Cooperate in good faith and proactively** with investigations and audits.
- **Communicate immediately to their hierarchical superior, and to the Compliance Ethics Office, if they have evidence, doubts, or suspicions regarding any form of corruption**. Likewise, they have the obligation to proactively declare the existence of a possible conflict of interest, whether their own or another's, from the moment at which they become aware of the situation, immediately informing their hierarchical superior and the Ethics and Compliance Office. To this end, Cepsa has internal channels developed for this purpose to facilitate communication of possible irregularities with the Audit, Compliance, Ethics and Risk Committee of the Board of Directors, including the Integrity Channel ([cepsa.ethicspoint.com](https://cepsa.ethicspoint.com)).

## Scope of Application

**This Policy applies to Cepsa, the Group's subsidiaries where effective control is exercised, their directors and employees, and to third parties with whom there are legal relationships and who have adhered to it.**

Additionally, persons acting as representatives of the Group in companies and entities not belonging to the Group, or where our Company does not have effective control, shall promote, to the extent possible, the implementation of principles and guidelines consistent with those set forth in this Policy.