

P.G.CL.00005 Anti-Corruption and Compliance Policy - English version

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FNMT-RCM Anti-Corruption and Compliance Policy

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1. CHANGES FROM PREVIOUS VERSIONS

- Modified the Scope of Application to exclude section 13 instead of 12, to reflect changes in the structure of former versions of the document.
- Modified section 5 to include the documents where received and provided gifts and hospitalities are bound to be registered.
- Modified section 10 to reflect the procedure for isolated cases where set thresholds are crossed. Also, the reporting frequency for agents and offices has been changed.
- Modified section 11 to include the format where conflicts of interest in tendering processes are to be registered.
- Section 18 "Related Documents" has been included at the end of the document.

2. PURPOSE

The purpose of this Anti-Corruption Policy is to instil a culture of zero tolerance of corruption, bribery and, in general, non-compliance with legal regulations in all members of the management and staff, as well as third parties outside the entity who interact with the staff, all based on the Banknotes Ethics Initiative (BnEI) and Article 30 et seq of the Criminal Code, as well as other regulations related to this area of application, with the FNMT-RCM being fully committed in all the sectors in which it operates.

3. SCOPE OF APPLICATION

This Anti-Corruption Policy applies to all employees and managers of the FNMT-RCM, regardless of the position they hold and the territory in which they are located, as well as its Management Committee, Executive Committee and Board of Directors.

It also applies to all activities carried out by the entity in Spain (specifically in the workplaces in Madrid and Burgos).

In addition, the policy applies, based on the existing contractual and

commercial relationship, to the entity's business partners, i.e. legal persons with which FNMT-RCM has commercial links and which may also provide services on behalf of FNMT-RCM to third parties.

The different headers of this policy are applicable to the regulatory scope of the Spanish Criminal Code. With regard to the BnEI initiative, all headings are applicable, except point [13](#) "Other prohibited conduct and practices".

4. APPLICABLE LEGISLATION

Within the scope of compliance regulations, the FNMT-RCM applies the following rules:

- ◆ BnEI (Banknote Ethics Initiative).
- ◆ Article 31 et seq of the Criminal Code (Organic Law 10/1995 of 23 November).
- ◆ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 (Whistleblowing) on the protection of persons who report breaches of Union law.

The most important FNMT-RCM documents related to the compliance system in place are the Integrated Policy of the FNMT-RCM management systems, the Code of Ethics or Conduct, the Anti-corruption and Compliance Policy, the Antitrust Policy, the Sales and Pricing Policy, the Guide to Good Commercial Practices, the Protocol on Relations with the Public Administration, the Competition Policy, the Sponsorship Authorisation Procedure, the Code of Ethics or Conduct for Suppliers, the Whistleblowing Channel Management Procedure, the Risk Management Procedure, and the Risk and Controls Matrix.

5. GIFTS, INVITATIONS AND HOSPITALITY

All FNMT-RCM employees, as well as intermediaries and commercial agents providing services for the Entity shall perform their duties with diligence and professionalism, avoiding any activity or conduct that could result in acts of bribery, corruption or that is contrary to the free market.

In this regard, FNMT-RCM managers and employees shall not promise, offer or give gifts, financial or in-kind remuneration, as well as any kind

of hospitality, such as dining, invitations, or any other such social or protocolary attentions, favours, donations or similar to third parties (including civil servants and staff of public bodies and entities) in exchange for any type of compensation, advantageous treatment or decision contrary to the law, whether made directly or indirectly through related persons, such as intermediaries or commercial agents (Any gifts or hospitalities provided must also be registered in the sanctioned format, when they exceed the maximum threshold established by the FNMT-RCM).

Furthermore, they shall not accept compensations of this kind, advantages or gifts from clients, suppliers, civil servants, institutions or any other person or entity participating in procurement procedures or awarded contracts under procedures or, where appropriate, with whom it carries out operations in which the FNMT-RCM is a supplier/recipient of goods or a provider/recipient of services.

Promotional gifts of an estimated value not exceeding 100 euros or the equivalent amount in the relevant currency may be given or accepted as a courtesy when such gifts are reasonably related to existing business relationships. Any received gift exceeding the value of 100 euros shall be refused and returned by the beneficiary or their Department, and this event reported to Human Resources, which will keep a record of what was received and returned whenever their value is above the upper limit established by the FNMT-RCM, by means of the sanctioned format. In the event that it is not possible to return a gift, the Department will hold a raffle among its personnel, or any other action it deems appropriate, in total transparency and respecting the ethical principles and values of the FNMT-RCM, reporting this decision to Human Resources.

6. DONATIONS, CONTRIBUTIONS AND SPONSORSHIPS

It is forbidden in the Entity to offer donations, contributions or sponsorships, by oneself or through an intermediary, to political parties or groups, federations, coalitions or groups of voters, as well as to receive them from any of these groups.

7. POLITICALLY EXPOSED PERSONS (PEP)

FNMT-RCM is prohibited from using or employing Politically Exposed Persons (PEPs) for the creation of new business opportunities. Therefore,

prior to the provision of the product/service, it will be checked whether the business opportunity is linked to the involvement of Politically Exposed Persons (PEPs). In this sense, the FNMT-RCM defines Politically Exposed Persons (PEPs) as persons that:

- ◆ Perform or have performed important public duties, such as heads of state, heads of government, ministers and other members of government, secretaries of state and under-secretaries; members of parliament; judges of supreme courts, constitutional courts and other high judicial bodies; equivalent members of the Public Prosecutor's Office; members of courts of auditors and boards of central banks; ambassadors and chargés d'affaires; senior military personnel of the armed forces; members of the boards of directors, management committees and supervisory bodies of publicly owned companies; directors, deputy directors and members of the board of directors, or equivalent posts, of international organisations; and senior officials of political parties with parliamentary representation.
- ◆ Are defined as senior officials in accordance with Article 1 of Law 3/2015, of 30 March, regulating the exercise of senior positions in the General State Administration.
- ◆ Perform important duties at Spanish regional level: presidents, councillors and other members of governing councils, as well as persons holding equivalent positions.
- ◆ Perform important duties at the local level in Spain: mayors, councillors and persons holding equivalent positions in the municipalities of provincial capitals or in the Autonomous Communities and Local Entities with more than 50,000 inhabitants.
- ◆ Senior management positions in Spanish trade union or employers' organisations.
- ◆ Persons performing important public duties in international organisations accredited in Spain.

Their close relatives and associates are also considered Politically Exposed Persons for these purposes:

- ◆ **Close relatives:** the spouse or domestic partner, as well as parents and children, and the spouses or domestic partners of the children.
- ◆ **Associates:** any natural person who is known to own or control a legal person or arrangement jointly with a person with public responsibility, or otherwise has close business relationships with such a person, or owns or controls a legal person or arrangement that is known to have been established for the benefit of such a person.

In the event of detecting a coincidence or sufficient evidence of a link with PEPs, the Compliance Committee shall assess whether to reject the business opportunity.

8. GUIDELINES FOR DEALING WITH PUBLIC AUTHORITIES AND PUBLIC OFFICIALS (NATIONAL AND FOREIGN)

The FNMT-RCM is fully aware of all intermediaries dealing with public authorities and civil servants and acting on behalf of the FNMT-RCM in those countries where the organisation operates.

In order to reduce any risk between intermediaries and relations with public bodies, it is prohibited to offer or give the following to a national or foreign public authority, official or employee, directly or through intermediaries or representatives:

- ◆ Gifts, remuneration, favours or services, irrespective of their economic value, conditional upon that authority, official or public employee making a decision that benefits the FNMT-RCM or any of its collaborators, or for omitting or delaying an act inherent in its duties to benefit the FNMT-RCM.
- ◆ Gifts, remuneration, favours or services, irrespective of their economic value, which constitute, directly or indirectly, a facilitation payment, for deciding on or expediting a permit or administrative procedure, inter alia, by that authority, official or public employee for the benefit of the FNMT-RCM or any of its clients.
- ◆ Influencing a national or foreign public authority, official or employee by means of a personal relationship (friendship, mutual business, etc.) with the public authority, official or employee or with another public authority, official or employee.

It is strictly forbidden for intermediaries or commercial agents to solicit or facilitate, on their own behalf or on behalf of the FNMT-RCM, any payment or reward of any nature or amount in exchange for unduly influencing an authority, official or public employee.

9. DUE DILIGENCE FOR SUPPLIERS AND THIRD PARTIES

The FNMT-RCM has a due diligence procedure for tendering and procurement processes for suppliers of goods and services, in accordance

with Law 9/2017, of 8 November, on Public Sector Contracts (hereinafter LCSP), which mitigates the risks normally associated with commercial relations with third parties. The due diligence procedure is divided into three phases:

- ◆ Due diligence measures in tendering processes: in this phase, preliminary market consultations are carried out, among other activities, to correctly prepare the procurement procedure laid down by the LCSP.
- ◆ Due diligence measures in the award process: the Evaluation Committee proceeds to the public opening of the envelopes containing the administrative and technical requirements of the tender specifications, evaluating the bids on the basis of economic and technical criteria. The procedure followed to ensure the ethical and reputational suitability of the selected suppliers, agents or intermediaries is also taken into account.
- ◆ Due diligence measures in the monitoring process: the FNMT-RCM periodically re-evaluates suppliers based on their technical performance, quality, ethics and compliance.

The FNMT-RCM's own due diligence procedure describes in detail the measures carried out to ensure a correct and transparent selection of suppliers in accordance with the LCSP and the BnEI model.

10. COOPERATION WITH COMMERCIAL AGENTS

The FNMT-RCM may be held liable for the actions of commercial agents acting in the name of or on behalf of the FNMT-RCM. It is therefore important that the commercial agent perform their duties diligently. The following is a list of guidelines to be followed by the commercial agent in international transactions and when representing the FNMT-RCM:

- ◆ Fulfil the duties entrusted to them with the utmost rigour at all times, being accountable for all acts that exceed, contradict, impede or disrupt the guidelines received.
- ◆ Inform the FNMT-RCM as quickly as possible of any inconveniences that may arise in special circumstances for the fulfilment of its instructions, complying with any new orders or instructions given as a result.
- ◆ Maintain at all times the dignity of their profession, refraining from any conduct that may be contrary to the principles and values set out in the Code of Ethics or Conduct and the FNMT-RCM's Anti-

Corruption and Compliance Policy.

- ◆ Not engage in fraudulent acts in the commercial relations entrusted to them that damage or harm the interests of the FNMT-RCM. Immediately inform anyone requesting their services of any situation that may be considered adverse to the representation of the FNMT-RCM.
- ◆ Inform the FNMT-RCM of the participation of any other intermediary or agent in a sales process on behalf of the FNMT-RCM, especially at international level.

In general, commissions for intermediaries and commercial agents acting on behalf of the FNMT-RCM may not exceed 5% or the maximum ceiling of 400,000 euros in a calendar year. In the eventuality that the contract with any agent does not provide for such limits or, due to the figures involved in already secured contracts, that remunerations would exceptionally be in excess of 400.000 euro, the contract shall require the special authorisation of the President's Office - Directorate General of the FNMT-RCM, the Governing Board, or the Delegate Commission. For their approval, the situation of the intermediary must be justified and documented, and the account submitted to the competent body, to substantiate this decision. Among other factors, the worth of the job performed by the agent, the risks attached to this remuneration and the established limits, must be particularly taken into account.

The Commercial Department will keep a form which will be required from all sales agents, which must report at least once every quarter to the Commercial Department of FNMT-RCM, with formal and detailed records of their activities. They must notify, along with other relevant issues, about their meetings with government officials, giving details of each interaction, and their results, in order for the Commercial Department to know and oversee what is being dealt and with whom. This information will be utilized in order to establish and justify remuneration levels for these agents. In case of Regional Offices, frequency for these reports will be monthly instead.

11. CONFLICTS OF INTEREST

Strictly speaking, a conflict of interest is a situation where an "interest" interferes or is likely to interfere with the ability of a person, organisation or institution to act in the interests of another party, provided the person, organisation or institution has an obligation to act in the interests of the other party.

Therefore, any managers, employees, intermediaries, commercial agents, members of the Management Committee, Executive Committee or Board of Directors of the FNMT-RCM who may be subject to a conflict of interest in the performance of their duties shall refrain from making decisions and, if there is any doubt as to a possible conflict of interest, the person concerned shall report it.

11.1 Conflicts of Interest in senior positions in the General State Administration

Senior officials shall perform their duties with the utmost transparency, legality and absence of conflict between their private interests and those inherent to their public duties.

They should avoid allowing their personal interests to unduly influence the performance of their duties and responsibilities.

A senior official is considered to have a conflict of interest when the decision they are about to make may affect their personal interests, whether economic or professional in nature, because it will be to their benefit or detriment. Personal interests are defined as:

- ◆ Self-interest
- ◆ Family interests, including those of their spouse or domestic partner, close friends and bitter enemies
- ◆ The interests of legal persons or private entities to which the senior official has been linked by an employment or professional relationship
- ◆ The interests of legal persons or private entities to which their family members are linked by an employment or professional relationship of any kind, provided it involves management, advisory or administrative functions

11.2 Conflicts of interest in tendering procedures

The FNMT-RCM is subject to Law 9/2017 on Public Sector Contracts, which describes the appropriate measures to prevent, identify and resolve conflicts of interest that may arise in procurement procedures.

In this regard, Law 9/2017 states:

Contracting authorities shall take appropriate measures to combat fraud, favouritism and corruption, and effectively prevent, identify and remedy conflicts of interest that may arise in tendering procedures in order to avoid

any distortion of competition and to ensure transparency and equal treatment of all candidates and tenderers in the procedure. For these purposes, the concept of conflict of interest shall cover at least any situation in which staff in the service of the contracting authority, who are also involved in the conduct of the tender/ award procedure or may influence the outcome of the procedure, have a direct or indirect financial, economic or personal interest which might appear to compromise their impartiality and independence in the context of the tender procedure.

The FNMT-RCM, being subject to the law, strictly complies with Law 9/2017, on Public Sector Contracts, in each tender procedure in order to achieve greater transparency in public procurement.

The FNMT-RCM has a reminder template so that the staff of the Purchasing and Commercial Departments are informed annually (and sign to confirm that they have been informed) that, in the event of a conflict of interest in a procurement procedure, they must inform their supervisor, a record must be made of the conflict of interest reported, and they may not participate in that procedure. They are reminded of this annually.

11.3 Conflicts of interest in the Contracting Committee

The Contracting Committee is a support and evaluation body that examines, classifies and assesses the proposal documentation received for approval and award of contracts, proposing to the competent body recommendations on contracting, as well as improvements in the processing of the files examined by virtue of its approval. Provisions to avoid conflicts of interest in the Contracting Committee are as follows:

- ◆ At the beginning of the contracting committee session, participants are reminded that if any of the participants have a conflict of interest in any of the files to be dealt with, they must notify this and leave when that file is to be dealt with.
- ◆ Members with a vote and say on the Contracting Committee, both permanent members and those attending by proxy, who are members of the governing and administrative bodies of investee companies, subsidiaries or any other organisations, shall abstain from discussing and voting in cases where the aforementioned organisations are tenderers.
- ◆ The abstention and the reasons for it shall be expressly recorded in the minutes, and the person concerned will leave the session before the files in which there may be a conflict of interest are dealt with.
- ◆ [When a conflict of interests arises in the Contracting Committee, it](#)

will be recorded in the forms kept by the Purchasing Department, as evidence of this circumstance.

12. PROHIBITED CONDUCT AND PRACTICES

The list below sets out actions, practices and conduct that are prohibited for FNMT-RCM management and staff, members of the Executive Committee and the Board of Directors, as well as third parties, suppliers and subcontractors acting on behalf of or representing the FNMT-RCM.

No form of non-compliance with the FNMT-RCM Anti-Corruption Policy will be tolerated or ignored or omitted and no member of staff who reports non-compliance may be punished for this reason.

12.1 Facilitation Payments

Facilitation payments are small payments made to a third party to obtain or "expedite business". These payments are usually given to public officials (domestic or foreign) to obtain licenses, certificates and other public services.

The FNMT-RCM will not make or accept facilitation payments anywhere in the world, nor will its commercial agents and intermediaries. In the event that a facilitation payment is the result of extortion, where personal safety is under threat and there is no alternative but to pay, the immediate supervisor and the Compliance Committee shall be notified as soon as possible. In the case of an intermediary or agent acting on behalf of the FNMT-RCM, it shall inform the FNMT-RCM without undue delay. In addition, the Compliance Committee will record and analyse the occurrence of facilitation payments in order to put in place additional controls to reduce the risks of such payments.

12.2 Corruption-related business conduct

- ◆ Receiving, requesting or accepting any kind of undue benefit or advantage, or offering or promising to obtain it for oneself or for a third party as consideration for unduly favouring another in the acquisition or sale of goods, the procurement of services or in commercial relations when carried out by an officer, director, employee or collaborator of the FNMT-RCM or a commercial or related company, engaging in such conduct oneself or through an intermediary.

- ◆ Promising, offering or granting any kind of undue benefit or advantage to directors, managers, employees or collaborators of a commercial enterprise or company for themselves or for third parties as consideration for unduly favouring themselves or a third party over others in the acquisition or sale of goods, the procurement of services or in commercial relations, engaging in such conduct oneself or through an intermediary.
- ◆ Promising, offering or granting any kind of undue benefit or advantage, pecuniary or otherwise, corrupting or attempting to corrupt, by oneself or through an intermediary, a public authority or official for their benefit or for the benefit of a third party, or complying with their requests to do so in exchange for acting or refraining from acting in connection with the exercise of public duties in order to obtain or retain a contract, business or any other competitive advantage in the conduct of international economic activities.
- ◆ Failure to comply with FNMT-RCM transparency and integrity rules and procedures.

12.3 Conduct related to corporate offences

- ◆ Falsifying the financial statements or other documents that should reflect the legal or financial situation of the FNMT-RCM, in such a way as to cause financial damage to the organisation, one of its members or to a third party, with the de facto or de jure directors being liable.
- ◆ Taking advantage of a majority position on the Board of Directors of the FNMT-RCM to impose abusive agreements for personal gain or for the personal gain of another individual, to the detriment of third parties, and without benefiting the entity.
- ◆ Imposing or taking advantage, for oneself or for a third party and to the detriment of the FNMT-RCM or any of its members, of a harmful resolution adopted by a fictitious majority, obtained by abuse of a blank signature, undue attribution of voting rights to those who legally do not have them, unlawful denial of the exercise of this right to those who have it recognised by law, or by any other similar means or procedure.
- ◆ Preventing or impeding without legal cause the actions of inspection or supervisory persons, bodies or entities by the de facto or de jure directors of the FNMT-RCM.

12.4 Conduct relating to money laundering

- ◆ Failure to comply with obligations relating to the prevention of money laundering and terrorist

financing. Carrying out transactions where the client or supplier is not identified.

- ◆ Engaging in operations or transactions intended to acquire, possess, convert or transfer property derived from the commission of an offence or to conceal or disguise the origin of the property.
- ◆ Engaging in operations or transactions intended to conceal or disguise the true nature, origin, location, destination, movement or rights to, or ownership of, property derived from an offence.
- ◆ Accepting payments from FNMT-RCM partners that do not comply with internally established payment procedures. Using, validating or accounting for false documentary support for the purpose of concealing expenditures or acquisitions.
- ◆ Accepting payments or transfers where there is no evidence of the origin of the funds.
- ◆ Splitting transactions or the relevant supporting documentation, such as invoices, delivery notes, purchase orders or similar, to enable the collection of amounts subject to less scrutiny or requirements.

12.5 Conduct linked to offences against the Public Treasury and Social Security

- ◆ Carrying out, in the name or on behalf of the FNMT-RCM or third parties related to it, by action or omission, fraud against the state, regional, provincial, local or European Union Public Treasury, evading the payment of taxes, amounts withheld or that should have been withheld or payments on account, unduly obtaining refunds or enjoying tax benefits in the same way.
- ◆ Carrying out, in the name or on behalf of the FNMT-RCM or third parties related to it, by action or omission, fraud against the general budgets of the European Union or other budgets administered by it, evading the payment of sums due to be paid or using the funds obtained for purposes other than that for which they were intended or unduly obtaining funds by falsifying the eligibility conditions required for their concession or concealing facts that would have prevented their concession.
- ◆ Carrying out, in the name or on behalf of the FNMT-RCM or third parties related to it, by action or omission, fraud against the Social Security by evading the payment of social security contributions and joint collection items, unduly obtaining refunds from the Social Security or unduly taking advantage of deductions for any item.
- ◆ Obtaining, in the name or on behalf of the FNMT-RCM or third parties related to it, for themselves or for third parties, benefits from the Social Security System, the undue extension thereof, or enabling others to obtain them, by an error caused by simulation or

misrepresentation of facts or the intentional concealment of facts they were duty bound to disclose, thereby causing damage to the Public Administration.

- ◆ Obtaining, in the name or on behalf of the FNMT-RCM or third parties related to it, subsidies or aid from the Public Administration, including the European Union, by falsifying the eligibility conditions required for their concession or concealing facts that would have prevented their concession.
- ◆ Using subsidies or aid granted by the Public Administration or the European Union to the FNMT-RCM or third parties related to it to finance an activity, in whole or in part, when the funds were intended for another purpose.
- ◆ Engaging in the following on behalf or in the name of the FNMT-RCM or third parties related to it when obliged by the Tax Law to keep business accounting and tax records:
 - Completely failing to comply with this obligation under the direct assessment of tax bases system.
 - Keeping different accounts for the same activity and financial year that conceal or simulate the true situation of the FNMT-RCM or of third parties related to it.
 - Failing to enter any business, acts, operations or, in general, financial transactions in the mandatory accounting records or entering figures other than the true ones in the records.
 - Making fictitious accounting entries in the mandatory accounting records.

12.6 Conduct related to counterfeiting currency and stamped effects

- ◆ Altering currency or making counterfeit currency.
- ◆ Exporting counterfeit or altered currency or importing it into Spanish territory or into any other Member State of the European Union. Transporting, dispensing or distributing counterfeit or altered currency with knowledge of its falsity.
- ◆ Putting counterfeit currency into circulation.
- ◆ Possessing, receiving or obtaining counterfeit currency for issue, distribution or putting into circulation.
- ◆ Currency is defined as coins and banknotes that are legal tender and currency that has not yet been officially issued or put into circulation, but which is intended to be circulated as legal tender. The currencies of other EU countries and foreign currencies shall be treated in the same way as the national currency.
- ◆ Counterfeit currency is also considered to be currency which, despite being produced in the FNMT-RCM's facilities and with legal materials, is produced knowingly in breach of the issuing conditions laid down

by the competent authority or when it is issued without any issuing order whatsoever.

- ◆ Counterfeiting or selling, in collusion with the counterfeiter, postage stamps or stamped effects, or introducing them into Spain knowing them to be counterfeit.

12.7 Conduct related to forged documents

- ◆ Any public employee, authority or official of the FNMT-RCM or of third parties related to it who, in the exercise of their duties, commits forgery by altering a public, official or commercial document in any of its essential elements or requirements to produce a document in whole or in part in such a way that leads to confusion as to its authenticity, assuming in an act the intervention of persons who did not intervene, or attributing to those who did intervene in an act statements or declarations different from those they would have made or failing to tell the truth in the narration of the facts.
- ◆ Knowingly presenting a false public, official or commercial document in court or using a false public, official or commercial document to the detriment of another.
- ◆ Altering, copying, reproducing or otherwise counterfeiting credit or debit cards or travellers' cheques.
- ◆ Manufacturing, receiving, obtaining or possessing tools, materials, instruments, substances, data and software, apparatus, security features or other items specifically intended for the forging of documents.
- ◆ Use of an authentic document, diploma, certificate or identity card by someone who is not authorised to do so.

12.8 Conduct relating to the impersonation of a public official and unlawful practice of a profession by an unlicensed person

- ◆ Unlawfully carrying out acts of a public authority or official in an official capacity.
- ◆ Exercising a profession without holding the relevant academic qualification issued and recognised in Spain in accordance with current regulations or not having an official qualification that accredits the necessary training and authorisation for its exercise.

12.9 Conduct related to the misconduct of public officials and civil servants

- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, issuing an arbitrary decision with the knowledge that it is unfair.
- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, in the exercise of their competence and knowing it to be illegal, proposing or appointing a person to exercise a specific public position when that person does not meet the legally established requirements for the purpose.
- ◆ Accepting the proposal, appointment or taking of office for the exercise of a specific public position without meeting the legally established requirements for the purpose.

12.10 Bribery-related conduct

- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, receiving or requesting for their own benefit or that of a third party, by themselves or through an intermediary, any kind of gift, favour or remuneration or accepting an offer or promise to carry out, in the exercise of their position, an act contrary to the duties inherent to their position or not carrying out or unjustifiably delaying an act that they should carry out, or carrying out an act inherent to their position under the aforementioned conditions. The same conduct is committed when it is the public authority, official or civil servant who receives or requests a reward for the conduct described above.
- ◆ Accepting, themselves or through an intermediary, gifts or presents offered to them because of their position or function as a public authority, official or civil servant of the FNMT-RCM or of third parties related to it.
- ◆ The conduct described above also applies to FNMT-RCM employees acting as jurors and arbitrators, whether national or international, and as mediators, experts, court-appointed administrators or officers and insolvency practitioners.

12.11 Behaviour related to influence peddling

- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, influencing another public official or authority by taking advantage of their position or of any other situation derived from their personal or hierarchical relationship with the latter or with another public authority, official or civil servant to obtain a resolution that may directly or indirectly generate financial gain for themselves or for a third party. Prohibited conduct also extends to offering to engage in the conduct referred to in this point,

soliciting gifts, presents or any other remuneration from a third party, or accepting an offer or promise.

12.12 Conduct related to embezzlement

- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, who, having powers to administer public assets, infringe these powers by exceeding them and, in so doing, cause damage to the assets administered or, to the detriment of another, appropriate for themselves or for a third party, money, effects, securities or any other property belonging to the public, which they received on deposit or for safekeeping, or which were entrusted to them by virtue of any other title that gives rise to the obligation to return them, or when they deny having received them.
- ◆ Using any means likely to cause financial damage to the FNMT-RCM or to third parties related to it by falsifying its accounts, documents that should reflect its financial situation or the information contained therein.
- ◆ Using any means likely to cause financial damage to the FNMT-RCM or to third parties related to it by providing third parties with false information relating to the financial situation of the Entity or any of the documents that should reflect its financial situation or the information contained therein.

12.13 Conduct related to fraud and illegal levies

- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, intervening by reason of their position or competences in any type of public procurement or in the liquidation of public property or assets, entering into agreements with the parties concerned or using any other artifice to defraud a public body.
- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, directly or indirectly demanding fees, tariffs or duties that are not due or of an amount greater than that legally established.

12.14 Conduct related to negotiations and activities prohibited to public officials and servants and abuse of power

- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, using their position or power to intervene in any manner of contract, matter, transaction or activity and take

advantage of such circumstance to force or enable any form of participation, directly or through an intermediary, in such business or actions.

- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, carrying out, outside the legally permitted cases, by themselves or through an intermediary, a professional activity or permanent or temporary consultancy, under or at the service of private entities or individuals, in matters in which they must intervene or have intervened by reason of their position, or in matters that are processed, reported or resolved in the office or management centre to which they are assigned or to which they report.
- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, using a secret or insider information they are privy to by reason of their office or position to obtain financial gain for themselves or for a third party.
- ◆ Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, sexually soliciting a person who, for themselves or for their spouse or domestic partner, ascendant, descendant, sibling by blood or adoption or with the same degree of affinity, has claims pending resolution by them or about which they must report or submit a consultation to their supervisor.

12.15 Conduct relating to false accusation and reporting and perversion of justice

- ◆ Imputing facts to a person before a judicial officer, which, if true, would constitute a criminal offence.
- ◆ Pretending before a judicial official to be responsible for or a victim of a criminal offence or reporting a non-existent crime, thereby giving rise to legal proceedings.

12.16 Conduct related to false testimony

- ◆ Not telling the truth when a witness in a court case.
- ◆ Knowingly presenting false witnesses or mendacious experts or interpreters.

13. OTHER PROHIBITED CONDUCT AND PRACTICES

The FNMT-RCM sets out additional forms of prohibited conduct in this Policy to improve the control environment of the Compliance Management System

and labour relations within the organisation:

13.1 Conduct that threatens physical integrity or life

- ◆ Non-compliance with the occupational health and safety rules at the FNMT-RCM.
- ◆ Non-compliance with regulations concerning the treatment of toxic, corrosive, flammable or explosive materials, substances and elements in environmental and occupational health and safety matters.

13.2 Conduct that threatens moral integrity

- ◆ Humiliating behaviour, comments, degrading jokes or threats with aggressive, discriminatory, offensive, insulting or humiliating content, especially in cases of gender or disability.
- ◆ Using abusive, threatening or crude language in a repeated and serious manner to address members of staff.
- ◆ Abuse of power that involves any of the aforementioned conduct or that constitutes conduct classified as a criminal offence or contravention of any other regulation or corporate compliance code to which the FNMT- RCM subscribes.
- ◆ Repeatedly and seriously defaming or discrediting a member of staff in front of their colleagues, especially when managers engage in such conduct towards their subordinates, spreading malicious, slanderous or libellous rumours that undermine their reputation, image or professional capacity.
- ◆ Repeatedly withholding or concealing information essential for the performance of a member of staff's work or manipulating it to mislead them and then accusing them of professional ineptitude and incompetence, when managers engage in such conduct towards their subordinates.
- ◆ Repeatedly and seriously impeding or undermining a member of staff in the decisions and initiatives they take within the framework of their job responsibilities and duties.
- ◆ Seriously and repeatedly engaging in the aforementioned conduct with the aim of causing a member of staff to resign from the FNMT-RCM.
- ◆ Repeatedly and seriously inducing or inciting other members of staff to engage in any of the aforementioned prohibited conduct, especially when managers engage in such conduct towards their subordinates.
- ◆ Failure to comply with FNMT-RCM harassment policies and other regulations.

13.3 Conduct classified as discovery or disclosure of secrets

- ◆ Seizing documents, letters, emails, software, computer equipment or mobile devices, as well as any kind of personal effects with the aim of violating the privacy of their legitimate owner or discovering secrets about that person.
- ◆ Intercepting telecommunications or using technical devices for listening, transmission, recording or reproduction of sound or image, or of any other communication signal with the aim of violating the privacy of its legitimate owner or discovering secrets about that person.
- ◆ The aforementioned conduct is particularly serious when it is carried out by the persons in charge of or responsible for files, computer, electronic or online media, archives or records, or by any member of staff by means of unauthorised access, use or alteration of confidential personal data of the legitimate owner.
- ◆ The actions indicated in the previous section shall be classified as particularly serious when they are used to disclose confidential personal data about a member of the FNMT-RCM staff.

- ◆ The actions set out in the two previous sections shall not be considered unlawful conduct when the FNMT-RCM engages in them in the exercise of its powers of control, security, supervision or based on the service requirements set out in the FNMT-RCM's policy on the use of and access to computer equipment and mobile devices in accordance with the law.

- ◆ Failing to comply with the FNMT-RCM's confidentiality, trade secrecy and data protection policies.

13.4 Conduct constituting possible fraud and/or swindling

- ◆ Signing and/or allowing the signing of any type of contract, agreement or public offerings with third parties or with other Public Administrations and their related or dependent bodies, knowing that it is impossible to comply with the obligations assumed for the benefit of the FNMT- RCM or third parties related to it.
- ◆ Giving misleading or untruthful information about the conditions of a product, the provision of a service or the execution of an activity of the FNMT-RCM or of third parties related to it.
- ◆ Failing to comply with the FNMT-RCM's procurement rules and procedures, as well as the public procurement regulations in force.
- ◆ Falsely attributing to oneself the right to dispose of movable or immovable property belonging to the FNMT-RCM that one does not

have, either because one has never had that right or because one has already exercised it, and disposing of, encumbering or leasing property belonging to the FNMT-RCM to another to the detriment of the entity or of a third party.

- ◆ Disposing of movable or immovable property belonging to the FNMT-RCM concealing the existence of an encumbrance thereon or, having unencumbered it, encumbering or disposing of it again before the definitive transfer to the acquirer to the detriment of the latter or a third party. Acting on behalf of the FNMT-RCM to the detriment of another or against the FNMT-RCM by entering into a simulated contract.

13.5 Conduct relating to malfeasance and misappropriation

- ◆ Those who, having powers to administer the assets of the FNMT-RCM or of third parties related to it, whether derived from the law, entrusted by an authority or assumed by means of a legal transaction, infringe them by exceeding the exercise of those powers, consequently causing damage to the assets of the FNMT-RCM or to third parties related to it.
- ◆ Those who, to the detriment of the FNMT-RCM or third parties related to it, appropriate for themselves or for a third party, money, effects, securities or any other movable property which they received on deposit or for safekeeping, or which were entrusted to them by virtue of any other title that gives rise to the obligation to return them, or when they deny having received them. Such conduct shall be construed as particularly serious when it involves pieces, elements, property or products of historical, cultural, artistic or scientific value. Using or allowing the use of money or other assets of the FNMT-RCM or of third parties related to it for purposes other than those for which they were given.

13.6 Conduct relating to impeding execution in bankruptcy

- ◆ Stripping the assets of the FNMT-RCM or those of third parties related to it to the detriment of creditors with a recognised right.
- ◆ Carrying out, in the name or on behalf of the FNMT-RCM, acts of disposal of assets or assuming obligations that delay, hinder or impede the effectiveness of a seizure of assets or of a judicial, extrajudicial or administrative execution or enforcement procedure that is underway or foreseeable.
- ◆ Carrying out acts of disposition, assuming obligations, debt or obligations that diminish the assets of the FNMT-RCM or in any way concealing elements of the entity's assets on which enforcement

could be effective for the purpose of evading payment of civil liabilities arising from an offence that has been committed in the name of the FNMT-RCM for which the entity as a legal person is liable or for responding to the economic rights of employees.

- ◆ Submitting an incomplete or mendacious list of assets or failing to provide such a list to the authority or official in charge of enforcement in a judicial or administrative enforcement procedure to which the FNMT-RCM or third parties related to it is a party, thereby delaying, hindering or preventing payment to the creditor.
- ◆ Using goods seized by public authorities and placed in deposit without being authorised to do so.

13.7 Conduct relating to bankruptcy fraud

- ◆ Concealing, damaging or destroying property or assets of or on behalf of the FNMT-RCM or third parties related to it, which are included, or would have been included, in the assets of an insolvency proceeding at the time of its opening.
- ◆ Carrying out acts of disposition, in the name or on behalf of the FNMT-RCM or third parties related to it, through the delivery or transfer of money or other assets, or through the assumption of debts, which are not proportionate to the debtor's financial situation or income, and which lack economic or business justification.
- ◆ Carrying out, in the name or on behalf of the FNMT-RCM or third parties related to it, sales transactions or service provisions for a price lower than their acquisition or production cost, and which in the circumstances of the case lack economic justification.
- ◆ Simulating third party claims or recognising fictitious claims.
- ◆ Participating in the name or on behalf of the FNMT-RCM or third parties related to it in speculative business, when this lacks economic justification and is, in the circumstances of the case and in view of the economic activity carried out, contrary to the duty of care in the management of financial affairs.
- ◆ Failing to comply with the legal duty to keep accounts, keeping two sets of books or committing irregularities in accounts that are important for providing an understanding of the organisation's assets and liabilities or financial position. The destruction or alteration of accounting records shall also be deemed to be prohibited conduct when it significantly impedes or prevents the understanding of the organisation's assets and liabilities or financial position.
- ◆ Concealing, destroying or altering the documentation that the FNMT-RCM or third parties related to it are required to keep before the legal retention period expires when this makes it difficult or impossible to examine or assess the debtor's true financial position.

- ◆ Drawing up the financial statements or the accounts of the FNMT-RCM or third parties related to it in a manner contrary to the regulations governing business accounting, in such a way as to make it difficult or impossible to examine or assess the debtor's true financial position, or failing to comply with the duty to draw up the balance sheet or inventory within the deadline.
- ◆ Engaging in any other conduct that, by action or omission, constitutes a serious breach of the duty of care in the management of the financial affairs of the FNMT-RCM or of third parties related to it and which diminishes the entity's assets or conceals the true financial position of the entity or its business activity.
- ◆ When the FNMT-RCM or third parties related to it are in a situation of current or imminent insolvency, favouring a creditor by carrying out an act of disposal of assets or generating obligations aimed at paying a claim that is not due or providing it with a guarantee to which it was not entitled when the transaction lacks economic or business justification.
- ◆ Whoever, in the name and on behalf of the FNMT-RCM or third parties related to it, after an application for insolvency has been admitted, without being authorised to do so either judicially or by the insolvency administrators, and outside the cases permitted by law, carries out any act of disposal of assets or which gives rise to obligations aimed at paying one or more creditors, privileged or not, with the postponement of the rest.
- ◆ Knowingly submitting false information concerning the accounting status of the FNMT-RCM or of third parties related to it to unduly obtain a declaration of bankruptcy.

13.8 Damage-related behaviour

- ◆ Intentionally causing any kind of damage to property belonging to the FNMT-RCM.
- ◆ The conduct referred to in the previous point shall be classified as serious when it is carried out in any of the following ways or for any of the following purposes:
 - Impeding the free exercise of authority or as a consequence of actions carried out in the exercise of their duties, whether the offence is committed against public officials or against private individuals who, as witnesses or in any other way, have contributed or may contribute to the execution or application of laws or general provisions.
 - Use of poisonous or corrosive substances.
 - Affect property of public or communal domain or use.
 - Bankrupts the aggrieved party or places them in a serious financial situation.
 - Causes particularly serious damage or harm to the general

interest.

- ◆ Anyone who intentionally, by any means, without authorisation and in a serious manner, deletes, damages, alters, suppresses or renders inaccessible computer data, computer programs or electronic documents of the FNMT-RCM or of third parties related to it, when the outcome is serious. In addition, hindering or disrupting the operation of a computer system by any of the conducts indicated in this point or by introducing or transmitting data, or destroying, damaging, disabling, eliminating or replacing a computer, online or electronic information storage system.
- ◆ The above conduct is particularly serious when the computer system of a critical infrastructure is affected or it seriously compromises the security of the State, European Union or a Member State of the European Union. Also in the case of unlawful use of personal data of another person to gain access to the computer system or to gain the trust of a third party.
- ◆ Intentionally causing damage by fire, causing explosions or using any other devices of similar destructive power, causing other particularly serious damage or endangering the life or integrity of persons.

13.9 Conduct related to intellectual property

- ◆ Reproducing, plagiarising, distributing, publicly disclosing or in any other way financially exploiting, in whole or in part, a literary, artistic or scientific work or performance, or its transformation, interpretation or artistic performance in or via any kind of medium, without the permission of the FNMT-RCM or third parties related to it that hold the corresponding intellectual property rights or their assignees.
- ◆ In the provision of information society services, with the intention of obtaining direct or indirect financial gain to the detriment of the FNMT-RCM or third parties related to it, actively and non-neutrally providing, beyond mere technical processing, access to or the location on the Internet of works or services that are subject to intellectual property rights, without the permission of the owners of the corresponding rights or their assignees, in particular by offering ordered and classified lists of links to the works and contents referred to above, even if the links had been initially provided by the recipients of its services.
- ◆ When acting on behalf of or representing the FNMT-RCM or third parties related to it, intentionally exporting or storing copies of works, productions or performances without the permission of the holders of the corresponding intellectual property rights or their assignees, including digital copies, when they are intended to be reproduced, distributed or publicly disclosed, or intentionally importing these

products without such permission, when they are intended to be reproduced, distributed or publicly disclosed, regardless of whether the source of the products is lawful or unlawful in their country of origin.

- ◆ Encouraging or enabling the conducts described in the previous point of this section by removing or modifying, without the permission of the holders of the intellectual property rights or their assignees, the effective technological measures put in place by them to prevent or restrict such conduct.
- ◆ Acting, on behalf of or representing the FNMT-RCM or third parties related to it, with the intention of obtaining direct or indirect financial gain by providing third parties with access to a copy of a literary, artistic or scientific work, or to its transformation, interpretation or artistic performance in or via any kind of medium, without the permission of the holders of the intellectual property rights or their assignees, by circumventing or enabling the circumvention of the effective technological measures in place to prevent it.

13.10 Conduct related to industrial property

- ◆ Manufacturing, importing, possessing, using, offering or introducing into commerce objects protected by industrial property rights knowing that they are registered, without the consent of their owners and for industrial or commercial purposes.
- ◆ Using or offering for industrial or commercial purposes, without the consent of the owners, the use of a process covered by a patent, or possessing, offering, introducing into commerce or using the product directly obtained by the patented process.
- ◆ Manufacturing, importing, possessing, using, offering or introducing into commerce objects covered in favour of a third party by an industrial or artistic design or topography of a semiconductor product.
- ◆ Manufacturing, producing or importing goods for industrial or commercial purposes whose distinctive mark is identical or confusingly similar to a product with a registered industrial property right, knowing that it is registered, without the consent of the holder of that right; offering, distributing or marketing wholesale or retail goods incorporating a distinctive mark identical or confusingly similar to the product, or storing them for that purpose, when it concerns the same or similar goods, services or activities for which the industrial property right is registered.
- ◆ Registering as its own any type of industrial or intellectual property obtained in the performance of the duties entrusted to the FNMT-RCM or using the FNMT-RCM's material, economic and/or personal resources.

13.11 Market and consumer-related behaviour

- ◆ Seizing, by any means, data, written or electronic documents, computer media or other objects containing FNMT-RCM or related third-party secrets with the aim of discovering them.
- ◆ Disseminating, disclosing or assigning to third parties FNMT-RCM or related third-party secrets that were discovered.
- ◆ Disseminating, disclosing or assigning FNMT-RCM or related third-party trade secrets to third parties by persons who are legally or contractually obliged to keep them confidential.
- ◆ Withdrawing raw materials or essential products from the market with the intention of depriving a sector of the market of supplies, forcing a change in prices or seriously harming consumers.
- ◆ Making, on behalf of the FNMT-RCM or third parties related to it, false claims or ascribing false characteristics to its products and services in a way that may cause serious and obvious damage to consumers.

13.12 Conduct related to the contravention of workers' rights

Using, in the name or on behalf of the FNMT-RCM or third parties related to it, deceit or abuse of a situation of necessity to impose on the workers in its service working or social security conditions that prejudice, suppress or restrict the rights they have recognised by law, collective agreements or individual contracts.

Simultaneously employing a number of workers without registering them with the Social Security or, where applicable, without having obtained the corresponding work authorisation.

Employing foreign nationals or minors without a work permit.

Maintaining unreasonable working conditions for employees who joined the FNMT-RCM following a transfer of undertakings.

Illegally assigning workers.

Recruiting people or luring them away from their jobs by offering misleading or false employment or working conditions. Employing foreign nationals without a work permit under conditions that prejudice, suppress or restrict the rights they have recognised by law, collective agreements or individual contracts.

Seriously discriminating in public or private employment against any person on the grounds of their ideology, religion or beliefs, family situation, ethnic origin, race or national origin, gender, age, sexual orientation or gender identity, aporophobia or social exclusion, illness or disability, for holding the legal or trade union representation of the workers, for being related to other workers in the company or for the

use of any of the official languages in Spain, and not restoring the situation of equality before the law following a requirement or administrative sanction, making good the economic damage caused. Preventing or restricting the right to freedom of association or the right to strike by deception or abuse of necessity or the use of coercion.

Failing to provide the necessary means for employees to carry out their work in appropriate health and safety conditions, thereby seriously endangering their life, health or physical integrity in breach of occupational health and safety regulations.

Failing to monitor subcontractors' compliance with occupational health and safety regulations. Obstructing any type of inspection activity in labour and occupational health and safety matters.

13.13 Conduct relating to spatial planning and urban development

Carrying out, in the name or on behalf of the FNMT-RCM or third parties related to it, unauthorised development, construction or building work on land intended for roads, green areas, public property or places whose landscape, ecological, artistic, historical or cultural value is legally or administratively recognised, or which for the same reasons have been considered to be of special protection or where such conduct takes place on land that cannot be developed. Reporting favourably on planning instruments, development, parcelling, reparcelling, construction or building projects, granting licences that are contrary to the spatial and planning regulations, concealing infringement of the regulations during inspections or failing to carry out mandatory inspections. Such conduct shall also apply to public authorities, officials or civil servants who, on their own or as a member of a collegiate body, resolved or voted in favour of the adoption of the instruments referred to in this paragraph.

13.14 Conduct related to historical heritage

Causing serious damage to an archive, register, museum, library, teaching centre or property of artistic, historical, cultural, scientific or monumental value belonging to the FNMT-RCM through gross negligence.

13.15 Conduct against natural resources and the environment

Breaching the laws or other general provisions to protect the environment, causing or whose actions directly or indirectly give rise

to emissions, discharges, radiation, extraction or excavation, silting, noise, vibrations, injections or deposits in the atmosphere, soil, subsoil, or inland, marine or ground waters, or undertaking water abstraction which, alone or in conjunction with other conduct, may seriously harm air, soil or water quality or the flora and fauna. Also in cases where the above conduct, alone or in conjunction with other conduct, could seriously upset the balance of natural systems or cause serious harm to persons.

Collecting, storing, transporting, recovering, processing, disposing of or using waste in contravention of laws and other general provisions, or failing to adequately control or monitor such activities, thereby causing serious harm to air, soil or water quality, the flora and fauna, death or serious injury to persons or seriously upsetting the balance of natural systems.

Failing in any way to comply with the duties of monitoring internal procedures in the field of environmental prevention and safety. Obstructing any kind of inspection activity.

Failing to comply with FNMT-RCM quality and environmental regulations and procedures.

13.16 Behaviours related to havoc

Causing explosions or using any other devices of similar destructive power, causing the destruction of buildings, public premises, tanks containing flammable or explosive materials, or blowing up industrial plants when the action poses a threat to the life, physical integrity or health of persons.

13.17 Conduct related to arson

Causing fires that endanger the life, physical integrity or health of persons.

13.18 Behaviours related to disobedience

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, openly refusing to comply with judicial resolutions, decisions or orders of a higher authority issued within the scope of their respective competences and covered by legal provisions.

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, suspending the execution of the orders of their superiors for no justifiable reason, and disobeying them after the latter have disapproved the suspension.

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, not providing due assistance for the Administration of Justice or any other public service after being required to do so by a competent authority.

13.19 Conduct related to breach of duty in the custody of documents and disclosure of privileged information

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, knowingly removing, destroying, rendering unusable or concealing, in whole or in part, documents entrusted to them for safekeeping by virtue of their office.

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, knowingly destroying or disabling the measures in place to prevent access to documents entrusted to them for safekeeping by virtue of their office when the competent authority restricted access to the documentation, or allowing others to destroy or disable such measures.

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, knowingly, and without the required authorisation, accessing or allowing access to confidential documents that were entrusted to them for safekeeping by virtue of their office.

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, disclosing secrets or confidential information they have knowledge of by virtue of their office or position and which must not be disclosed.

13.20 Conduct relating to obstruction of justice and professional misconduct

Using violence or intimidation with the aim of directly or indirectly influencing a complainant, party or suspect, lawyer, court procurator, expert, interpreter or witness in a proceeding in an attempt to change their behaviour.

13.21 Conduct against state institutions

Failing to appear before a Commission of Inquiry in Parliament or a Legislative Assembly of an Autonomous Community, having been required to do so in a legal manner and under warning.

Obstructing an investigation by the Ombudsman, the Court of Auditors or equivalent bodies of the Autonomous Communities,

refusing or unduly delaying the sending of reports requested by them or hindering their access to the files or administrative documentation necessary for the investigation.
Giving false testimony before a parliamentary committee of enquiry.

13.22 Conduct related to the misuse of authority

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, issuing general provisions or suspending their execution without having the powers to do so.

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, arrogating judicial powers or preventing the execution of a resolution issued by the competent judicial authority.

Being a public authority, official or civil servant of the FNMT-RCM or of third parties related to it, attempting to undermine the independence of Judges, guaranteed by the Constitution, by addressing them with an instruction, order or summons relating to cases or proceedings that they are hearing.

13.23 Conduct relating to the exercise of fundamental rights and public freedoms guaranteed by the Constitution

Publicly encouraging, promoting or inciting, directly or indirectly, hatred, hostility, discrimination or violence against a group, part of a group or against a specific person because of their membership of the group, on racist, anti-Semitic or other ideological grounds, religion or beliefs, family situation, membership of an ethnic group, race or nation, national origin, gender, sexual orientation or gender identity, illness or disability on FNMT-RCM premises, or on the occasion of events held on its behalf. This also applies to persons who produce, create, possess with the purpose of distributing, provide third parties with access to, distribute, disseminate or sell documents or any other kind of material or media whose content directly or indirectly encourages, promotes or incites the conducts described above.

Calling or attending unlawful demonstrations on FNMT-RCM premises, or on the occasion of events held in its name, understanding as such those held to commit a crime or those attended by people with weapons, explosive devices or blunt objects or in any other dangerous way.

Carrying out acts of violence against the authorities, their agents, persons or public or private property on the occasion of a meeting or demonstration on the premises of the FNMT-RCM or on the occasion of events held on its behalf.

Preventing the legitimate exercise of the freedom of association and

expression, or seriously disrupting a lawful assembly or demonstration on the premises of the FNMT-RCM or at events held on its behalf.

Creating, promoting and cooperating financially or by other means with unlawful associations on behalf of the FNMT-RCM or third parties related to the FNMT-RCM.

13.24 Behaviour related to public disorder

Invading or occupying, against the will of the FNMT-RCM, FNMT-RCM facilities and establishments, even if they are open to the public, and thereby causing a significant disturbance to the public peace and the normal activity of the entity.

14. IDENTIFICATION, ANALYSIS AND ASSESSMENT OF RISKS

The identification, analysis and assessment of the risks of this Anti-Corruption Policy are carried out in accordance with the methodology described in the FNMT-RCM Compliance Manual and the Risk Management procedure, the main principle of which is the prioritisation of risks based on the type of business and the risks associated with the FNMT-RCM's activity.

The FNMT-RCM Compliance Management System includes an analysis of the compliance risks described in this Anti-Corruption Policy, prioritising those risks that entail greater exposure to non-compliance events.

Corruption risks are identified and assessed in the FNMT-RCM's Risk Prioritisation Map and Risk and Control Matrix.

15. PAYMENT CONTROL

The FNMT-RCM has policies and procedures in place to ensure that, before making payments to agents, intermediaries and suppliers in general, there is an actual obligation to pay, that the service or goods were provided in accordance with the agreed terms, and that payments are made to the suppliers' accounts in accordance with the law. This document is the P.E.EF 01010 Supplier Invoice Management Procedure.

16. REPORTING OF IRREGULARITIES

Any doubts regarding the application of this policy shall be addressed to the direct supervisor and/or the Regulatory Compliance Committee (Compliance Committee) through the communication channels established by the FNMT-RCM for this purpose, including the Whistleblowing Channel.

This procedure shall also be used if there is a well-founded suspicion of non-compliance with the provisions of this policy, the Catalogue of Prohibited Conduct, the Code of Ethics or Conduct or any other procedure or policy established by the FNMT-RCM.

17. DISCIPLINARY MEASURES

Failure to comply with the provisions of this policy or the procedures that develop or complement it may give rise to the corresponding disciplinary penalties in accordance with the FNMT-RCM Collective Bargaining Agreement, labour legislation and the other civil and commercial obligations undertaken by the FNMT-RCM staff member, management personnel and members of the Board of Directors, without prejudice to any criminal liability that may arise from the commission of offences.

18. DOCUMENTOS RELACIONADOS

<u>Format to register received gifts and hospitalities (In Spanish)</u>	<u>P.G.CL.00003.03</u>
<u>Format to register provided gifts and hospitalities (In Spanish)</u>	<u>P.G.CL.00003.04</u>
<u>Format to register conflicts of interest in tenders (In Spanish)</u>	<u>P.G.CL.00005.01</u>
<u>Format for activities reports by Agents and Offices</u>	<u>P.G.CL.00005.02a</u>