



Gifts, Donations and Invitations Policy



business practices, courtesy or facilitation may give rise to the delivery or receipt of promotional gifts, courtesy details or attentions within the framework of applicable uses and customs.

Cox, beyond the mere literality of the legal precepts in the jurisdictions where it operates, is committed to strict compliance with the Law at all levels beyond any ethical questioning.

The Code of Business Conduct and Ethics establishes a zero tolerance principle for bribery and corruption practices, and expressly prohibits influencing the will of third parties with the aim of obtaining advantage or preferential treatment.

In this context, a large part of the group's activity is linked to contracts tendered by public administrations (large suppliers or private clients, etc.), which highlights the need to observe rules of conduct that remove any shadow of doubt regarding the company's ethical commitment.

This policy on gifts, donations and invitations aims to establish clear principles regarding the giving or acceptance of gifts and hospitality by the company. The general principle is the prohibition of granting any type of gift, invitation, offer or donation to any third party, including political parties or organizations (including NGOs) that could act in an indirect or fraudulent manner, and the non-acceptance of the same, expressly including facilitation payments, i.e. those admitted by commercial practice, of little economic relevance individually considered to be aimed at speeding up an administrative procedure or similar.

Scope of application

This policy applies to all companies within the Cox Group and to all their employees. More specific requirements may be introduced for each country or business if necessary or appropriate, but local or sector specificities do not exempt the application of the principles set out in this document.

General principles

For the purposes of this policy, a gift is considered to be any object or action, regardless of its origin, nature or characteristics, that is given free of charge and voluntarily within the framework of a social relationship. The concept of a gift includes hospitality, meaning invitations to cultural or sporting events and shows, social and festive events, meals or trips, provided that they are not institutional, technical or training-related.

Gifts may be given or received occasionally as long as they are merely a courtesy, are in accordance with the practices, uses and customs of the business and the territory and are reasonable. To do so, it is essential to obtain prior express written authorization using the corresponding electronic form containing the explanatory details and justification of the proposed action.

Special attention must be paid to this type of action, avoiding any circumstance that could give rise to doubts about the impartiality, objectivity or legality of the behavior of the company and its employees.

Therefore, gifts will always be received or given in a transparent and occasional manner, and no employee may accept or give a gift that does not comply with the following principles:



- a) **Legitimate content** : The gift offered or received must be legitimate in terms of its content, that is, it must not involve or include objects or activities that are prohibited by law or may be considered inappropriate or unprofessional. In addition, all gifts made must comply with this policy.
- b) **Legitimacy of motivation** : The gift must not be directed towards or intended to obtain future preferential treatment from the group towards the person or entity making the gift or from said person or entity in favour of the group. In this regard, and to avoid any doubts in this regard, when accepting or receiving a gift, those that, due to a coincidence in time or for other reasons, may be perceived externally as being associated with the desire to influence professional decisions should be avoided.
- c) **Reasonableness** : The gift must be reasonable and appropriate to social conventions, custom and commonly accepted practice. Likewise, the gift must be proportionate to the relationship with the third party to whom the gift is offered or from whom the gift is received.
- d) **Express authorization** in advance, and written using the corresponding electronic form, which contains the explanatory and justifying details of the proposed action.

As a general rule, gifts of reasonable value are considered to be proportionate gifts, meaning gifts with a value not exceeding **100 USD** , or the corresponding currency.

In relation to gifts given by employees to third parties, the limit of USD 100 applies to the aggregate value of all gifts, invitations or hospitality received by the same person in a six-month period. In relation to gifts received by employees of the group, the limit of USD 100 applies to the aggregate value of all gifts, invitations or hospitality received from the same company or entity in a six-month period.

In the case of hospitality services, regardless of the amount, it is essential to obtain prior express written authorization using the corresponding electronic form containing the explanatory details and justification of the proposed action.

Both internal and external monitoring or audits may be carried out on expenses incurred on gifts and hospitality in order to ensure proper compliance with this policy.

Gifts that involve cash, goods that can easily be redeemed in cash or comparable alternatives (e.g. gift cards or discounts in physical or online stores) or to cover lodging or similar expenses may not be accepted or given, and documented payment of said expenses is required. Gifts may not be accepted or given to intermediaries or fiduciaries who are outside the business relationship. Gifts may not be made or accepted through a related person, understood as spouses (or similar), ascendants, descendants and siblings.

- d) **Unilaterality** : Gifts may not be requested or given to third parties outside the group that have been previously requested.

All of this applies to conduct outside the purely commercial context and in a reasonable and transparent manner. Thus:



- Reimbursement of business travel expenses should not be made directly to the official, but rather, to the extent possible, directly to the service provider for payment, or otherwise, to the office, department or agency to which the official is assigned.
- Always obtain the corresponding invoices and proceed with their correct accounting.

The **whistleblower channel** The Cox report reporting procedure (canal_denuncias@grupocox.com) is common to the group companies controlled by Cox. The confidentiality of the informant is guaranteed, as is the transparency and objectivity of the reporting procedure and its resolution. The Reporting Procedure is regulated in detail in its corresponding document.

Entry into force : This document enters into force upon approval by the Board of Directors and will remain in force until it is updated, revised or repealed. The current version, revised in September, 29, 2024, is the current one, approved by the Board of Directors on November, 21, 2024. This policy must be kept up to date and may be revised annually, and on an extraordinary basis, whenever there are changes in the strategic objectives or applicable legislation, with the Compliance Director submitting a proposal for modification to the Compliance Committee, and from there to the Board of Directors.

Cox ABG Cox			
Policy	• Gifts and Presents		
Responsible	• Board of Directors		
Area	• Corporate – Regulatory Compliance		
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