



REGULATIONS OF  
ACCEPTING AND  
OFFERING GIFTS AND  
TOKENS OF  
APPRECIATION

November 2013 – Rev 1

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## AIM

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To standardize the exchange of gifts and tokens of appreciation between employees of Gestamp and third parts, that have or could have any commercial, contractual or professional relationship with Gestamp, setting limits of value and appropriate approbation flows, in order to avoid these facts can be considered as bribery.

This regulation is made in the frame of Gestamp Code of Conduct and develops the standards "Demanding and accepting gifts and tokens of appreciation"; "Offering and granting gifts and tokens of Appreciation" and "Bribery and corruption" included in the chapters "Trading partners" and "Public Administrations and communities".

## SCOPE

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The present regulations apply to employees of Gestamp whom are susceptible to offer or receive gifts and tokens of appreciation from third parts.

Besides, they apply to people related to these employees of Gestamp, insofar as they could, due to their relationship, offer or receive gifts and tokens of appreciation from/to third-parts.

However, they don't apply to gifts and invitations made between employees or companies belonging to the Gestamp Group.

These regulations won't replace other local rules where the limits of the set values are lower, additional approbations are incorporated and specific rules according to the costume of the country / region are added. Anyway, local rules will meet the requirements of these regulations.

## DEVELOPMENT

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As general principle, every employee that plan to offer or demand gifts or tokens of appreciation from/to a third part must comply with the following requirements:

- The gift or token is allowed by the local legislation, regulations and policies.
- It cannot be offered and accepted in exchange for any fraudulent advantage.
- Nature, economic value and frequency of the gift or token must be appropriate to the situation in which is been offered or demanded and to the position and circumstances of the addressee.
- It can be offered or received in a transparent fashion, it means, it must be susceptible to be identified and audited.

The acceptable and unacceptable behaviors are detailed below:

### **CASH**

Employees of Gestamp will not be able to, under no circumstances, demand, accept or offer cash gifts.

### **INVITATIONS**

Benefit, in which the donor is present, given to an employee of Gestamp by third parties or delivered to third parties by an employee of Gestamp. It refers to lunches, drinks, tickets to events (theatres, concerts, exhibitions, sport events, etc.)

- I. In general, invitations can be accepted and/or offered whenever they are reasonable, occasional, of modest value and carried out within a professional scope. If for courtesy, protocol reasons or other, one employee must offer or accept one invitation that doesn't comply with the previous criteria, it must be previously authorized by the immediate superior of your company or justified afterwards.
- II. Invitations will not involve activities, products or meeting places that can be considered embarrassing or in bad taste or can unfulfilled the standard of the Code of Conduct.
- III. Invitations offered/ accepted to/of civil servant or State must be authorized.
- IV. Invitations to events or shows delivered or received in the home address will not be able to be offered or accepted.
- V. Invitations to trips or accommodations, except if it takes part of an event related directly to the professional interest of the employee of Gestamp, must be rejected. In case of the exception, the immediate superior of your company must previously authorize it.

### **GIFTS**

Benefit (monetary or not), different of invitations, given to an employee of Gestamp by third parties or delivered to third parties by an employee of Gestamp. Expressly, all kinds of services and the obtaining of merchandising with lower price than the market value are included.

- I. In general, gifts that exceed the value set of 50€, will not be able to be accepted and offered. If for courtesy, protocol reasons or other, one Employee must offer or accept one gift that exceeds the set amount, it must be previously authorized by the immediate superior of your company or justified afterwards.
- II. Gifts will not involve activities, products or meeting places that can be considered embarrassing or in bad taste or can unfulfilled the standard of the Code of Conduct.
- III. Under no circumstances, gifts will not be offered/ accepted to/of civil servant or State without prior written authorization by Human Resources Management. They never will exceed the limit set.
- IV. Gifts delivered or received in the home address will not be able to be offered or accepted.
- V. Trips or accommodations will be rejected and not accepted.

### **DONATIONS**

Donations in name of Gestamp will not be able to be allowed without prior written consent of Gestamp Management.

## **RESPONSABILITIES**

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Employees must not assume personally the cost of any invitation or gift with the aim of avoiding their mandatory of looking for the approval in the circumstances in which are required.

## **AMENDING AND REVISING**

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The review and approval of these Regulations is the responsibility of Gestamp's Board of Directors.