



## ANTI-CORRUPTION POLICY

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**WORLD W SENSING**  
Worldsensing S.L.  
NIF B64902208

Drafted by		Approved by		Version	
Responsible body	Date	Responsible body	Date	Version	Date
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## 1. OUR COMMITMENT

At Worldsensing, S.L. (hereinafter, “WORLDSENSING” or the “Company”), we undertake to perform our business activity with the highest standards of transparency, integrity and responsibility and prevent any type of public or private corruption, either active or passive, at our organisation. That commitment is detailed in the Company's values stated in its Code of Ethics.

This policy shows our corporate responsibility commitment, helps to foster an ethical corporate culture and increases the external stakeholders' trust in how WORLDSENSING does business.

Whoever acts in the name and stead of WORLDSENSING has the duty to fully comply with this policy. Everyone is responsible for conducting themselves appropriately and applying good governance judgement at all times and in each of their decisions and actions.

## 2. OUR OBJECTIVE

WORLDSENSING approves this Anti-Corruption Policy as an initiative to fight potential fraudulent behaviour and conduct which contravenes the prevailing anti-corruption regulations and laws in the countries where it establishes, or may establish, business relations.

Therefore, the Company undertakes to have zero tolerance towards corruption in all its forms among individuals and with the public administrations or civil servants, including business corruption, extortion, bribery of a civil servant, influence peddling and illegal funding of parties.

This Anti-Corruption Policy forms part of the policies making up WORLDSENSING'S Compliance Management System.

To supplement this Policy's implementation, there are internal protocols and rules on the following matters:

- donations and sponsorships (Annex 1),
- training expenses (Annex 2),
- gifts, courtesies, invitations, compromising offerings, and entertainment and hospitality expenses, regulated in WORLDSENSING'S Protocol on Accepting and Giving Gifts (Annex 3).

## 3. REGULATORY REFERENCES

WORLDSENSING has an international vocation and operates in many countries around the world and diverse geographical areas. Each country may have a specific anti-corruption legislation, which implies that the Company may be subject to compliance with very diverse regulations, including the following:

- The 2005 United Nations Convention against Corruption,
- The OECD Anti-Bribery Convention,

- The Spanish Criminal Code: (i) corruption between private individuals, articles 286 bis to 288, and (ii) bribery of a civil servant, articles 424 to 427 bis,
- The US Foreign Corrupt Practices Act,
- The UK Bribery Act,
- Brazilian Anti-Corruption Law 27.401.

In addition to respecting the aforementioned regulations, among others, in its businesses, WORLDSENSING also uses the recommendations, processes and controls of the ISO 37001:2016 standard on Anti-Bribery Management Systems as a reference in its organisation.

## 4. SUBJECTIVE SCOPE

This policy applies to WORLDSENSING'S Board of Directors, senior management and workforce, plus the collaborators who do not have an employment relationship with the Company but act in its name and/or stead (e.g. commercial agents or other intermediaries).

## 5. DEFINITIONS

### 5.1 Corruption

Corruption is regulated in the Spanish Criminal Code as (a) corruption between private individuals (articles 286 bis to 288) and (b) bribery of a civil servant (articles 424 to 427 bis).

Article 286 bis of the Spanish Criminal Code defines corruption in the private sector (corruption between private individuals) as *“receiving, requesting or accepting a benefit or advantage of any unjustified nature, and offering or promising its obtainment, for oneself or for a third party, as consideration to unduly favour another in the acquisition or sale of goods, in the hiring of professional services or in business relations.”*

On the other hand, article 424 of the Spanish Criminal Code defines corruption in the public sector (bribery of a civil servant) as *“the private individual who offers or delivers a handout or remuneration of any kind to an authority, civil servant or person who participates in the exercise of public duties in order for the latter to perpetrate an act that is against the duties inherent to his office, or an act inherent to his office, or in order for him not to carry out, or to delay what he should carry out, or in consideration of his office or duty.”*

In both cases, those crimes can also be committed by the Company itself (legal person).

### 5.2 Bribery

Corruption can take place using bribery as the means. The ISO 37001 standard on Anti-Bribery Management Systems focuses solely on bribery since it is the most controllable form of corruption within organisations. It defines bribery as an act to *“offer, promise, provide, accept or request directly or indirectly and independently of the place an undue advantage in any value (which may be economic or non-economic), violating the applicable law as an incentive or reward convincing someone to act or omit actions in connection to the performance of that person's duties.”*

In other words, bribery can be understood as someone offering or receiving something of value (usually money, a gift, a loan, a reward, a favour, a commission or entertainment) as an inappropriate inducement or reward for obtaining businesses or another benefit. Moreover, bribery can take place in the public sector (e.g. bribing a civil servant) and in the private sector (e.g. bribing a client's employee or a business partner), regardless of whether this is done directly or indirectly, through inappropriate payments by or through third parties.

### **5.3 Influence peddling**

Influence peddling is described as any acts or strategies aimed at orienting or influencing the actions carried out by civil servants or authorities using any situations arising from personal relationships, with them or with any other civil servants or authorities, to achieve a resolution which may directly or indirectly generate economic benefit or avoid losses of any type for the company itself or a third party.

## **6. ZERO TOLERANCE**

WORLDSENSING has zero tolerance towards all forms of corruption, which means that any suspected incidents of corruption must be investigated and any improper behaviour may lead to disciplinary measures for the organisation's staff, including dismissals in serious cases, criminal charges, contract terminations or other penalties in the case of professional services, suppliers or even clients.

## **7. SCOPE**

This Policy must be known and applied by all the persons who form part of WORLDSENSING, including its Board of Directors, senior management and all the staff (whatever their type of contract), who must make sure that they do not get involved in any of the corruption or bribery activities in any way, and they must undertake to understand, accept and apply the Policy described in this document.

The Anti-Corruption Policy must be disclosed to all the third parties (clients, suppliers, collaborators, including professional services) so that it is considered and respected by them within the framework of the activities involving the existing business relations with Worldsensing.

## **8. DUE DILIGENCE**

### **(1) Ethical principles**

WORLDSENSING bases its relations with the public and private sector on the principles of transparency and equal opportunities, and rejects any actions aimed at achieving an advantage over its competitors.

### **(2) Business partners**

To make sure that WORLDSENSING works only with the appropriate third parties, it has a compilation and information process regarding the counterparty's qualifications, reputation and associations.

### **(3) Relations with the Public Administrations**

WORLDSENSING undertakes to maintain a record of the meetings held between its representatives and the public authorities or civil servants to ensure maximum transparency in its activities.

### **(4) Staff hiring**

In its staff selection and hiring procedures, WORLDSENSING applies diligent measures to prevent hiring people who may be controversial regarding the practices to be eliminated and avoided with this Policy.

## **9. CONFLICT OF INTEREST**

Conflicts of interest are expressly forbidden.

Conflicts of interest exist when members of WORLDSENSING have professional, personal or private interests that deviate from the interests expected from them when they represent the Company, i.e. when a person's interests are in conflict with those of the Company.

For example, Company representatives may be tempted to prioritise their private interests over those of the Company and make decisions which do not coincide with WORLDSENSING'S interests and objectives; this would be the case if they chose suppliers simply because of their relationship with them, without assessing the price or quality criteria.

To show compliance with that stated in this Policy and prevent certain situations from being misinterpreted or casting doubts about a specific decision's objectivity, all the parties involved must store the evidence of those situations and notify and document them. To that end and to prevent and control these types of situations, WORLDSENSING has a Corporate Intent Policy, approved by the Company's Board of Directors.

## **10. CONTINUOUS REVIEW AND IMPROVEMENT**

WORLDSENSING shall regularly verify or oversee this Policy. The monitoring and review process will enable it to:

- Make sure that the design and use of the controls established are effective and efficient by monitoring their performance and the results obtained,
- Obtain additional information considered to be necessary for improving risk assessment,
- Analyse and draw conclusions from the events, changes, successes and failures,
- Identify the emerging risks,
- Ensure that the expected results were achieved and the risk assessment results were appropriately applied.

WORLDSENSING has also implemented accounting practices that help to guarantee the accuracy in its accounting books and ledgers, which is a form of controlling corrupt practices in itself.

Worldsensing's Board of Directors and senior management undertake to comply with this Policy and the processes involved in the Anti-Bribery Management System to achieve continuous improvement and meet the proposed anti-corruption objectives.

## 11. ANTI-BRIBERY COMPLIANCE FUNCTION

WORLDSENSING has an Anti-Bribery Compliance Function, represented by the officer in charge of Worldsensing's Risk Department.

That Function must ensure respect with that stated in this Policy, deal with the conflicts that may arise related to it, in coordination with the Compliance Committee when required, and establish action plans to resolve and safeguard the Company's interests.

Worldsensing's management must provide the person who carries out the Anti-Bribery Compliance Function with the authority and independence required so that he/she can discharge the following responsibilities effectively:

- Conduct the investigations that are necessary for the Anti-Bribery Management System in coordination with the Compliance Committee,
- Provide the staff with training and guidance on the Anti-Bribery Management System,
- Inform the Compliance Committee of the Anti-Bribery Management System at specific time periods and/or when this is considered to be pertinent for each specific situation within the context of that management system.

The person who carries out that function must remain impartial when he/she has to simultaneously play a role other than the Compliance Function within the organisation.

## 12. BREACHES. REPORTING AND SUSPICIOUS ACTIVITIES

All the WORLDSENSING staff has the obligation to report any breaches or malpractices observed when carrying out their professional activities.

If an actual or suspicious breach of this Policy is known, this must be reported to the following channel that has been enabled: [compliance@worldsensing.com](mailto:compliance@worldsensing.com)

or to the following postal address:

Canal Ético  
Worldsensing, S.L.  
C/ Viriat, num. 47, 10 piso 08014, Barcelona, Spain

The compliance channels are overseen by the Compliance Committee so that all the stakeholders can make consultations or report breaches of this Policy with maximum confidentiality guarantees and without fear of retaliation.

The allegations received shall be treated by the Compliance Committee and reported to the person carrying out the Anti-Bribery Compliance Function.

Worldsensing guarantees the confidentiality of the information reported to it and, therefore, any allegations of corrupt activities or suspicious bribes shall be treated confidentially.

Anyone who, in good faith or with a reasonable belief, reports allegations shall be protected from all forms of discrimination and penalisation as a result of those allegations. Consequently, false or defamatory allegations may be penalised or result in legal actions.

### 13. AWARENESS RAISING (DISCLOSURE AND TRAINING)

This Anti-Corruption Policy shall be made available to all the Worldsensing staff through the ordinary communication channels (email and Worldsensing's Legal & Compliance Department intranet) and remain on Worldsensing's website as a sign of transparency vis-à-vis third parties, both private partners and representatives of the Public Administration.

The Anti-Corruption Policy shall be subject to the appropriate disclosure, training and awareness actions for its proper understanding and implementation within the Company.

### 14. APPROVAL AND ENTRY INTO FORCE

This Policy is approved by the Board of Directors, enters into force on its approval date and shall be in force until its cancellation is approved.



## ANNEX 1 - Protocol on donations, sponsorships and political contributions to third parties

### 1. INTRODUCTION

This protocol expands upon WORLDSENSING'S Anti-Corruption Policy and its objective is to establish the procedure that must be followed by the Company and its staff in the following situations:

#### a) **Donations and sponsorships:**

Donations are aimed at granting financial or in-kind contributions to entities declared to be of public interest (foundations and associations) and with which we show social or civic responsibility and provide support to the non-governmental organisations in which WORLDSENSING participates.

Sponsorships are aimed at granting financial aid to the sponsored companies so that they can carry out sports, charity, cultural, scientific or similar activities in exchange for their commitment to collaborating in WORLDSENSING'S advertising activity.

#### b) **Political contributions**

Political contributions are considered to be sums in cash and any other payments or benefits in cash or in kind in WORLDSENSING'S name, including any types of goods or services to any parties, political coalitions or political candidates.

### 2. GUIDELINES ON DONATIONS TO OR SPONSORSHIPS OF THIRD PARTIES

WORLDSENSING considers and accepts the donations and sponsorships that conform to its social project and do not raise special concerns.

#### **Special concerns:**

The following practices can be considered to be special concerns:

- When there is a suspicion or it is believed that the charity organisation or event is closely linked to a civil servant (including all the staff, authorities, public officials or any other person at any level of a government department or agency, and the employees of companies owned or controlled by the government) or a close family member or a business associated with a civil servant.
- When the donation or sponsorship has been requested by a civil servant.
- When there is a suspicion that the payment is intended to influence, or may reasonably be perceived as an influence to obtain, a tender or another decision in favour of the organisation.
- When the donation or sponsorship is made before, during or immediately after the contract negotiations.

#### **Cases allowed:**

If WORLDSENSING employees –or a governing or administration body by applying a general policy– believe that it is appropriate to make donations or sponsorships in WORLDSENSING'S

name, they must obtain prior written authorisation from WORLDSENSING'S Risk Department Officer.

Before granting authorisation, the Risk Department Officer must verify the beneficiary's identity and reputation in relation to bribes or similar criminal conduct plus any connection with the organisation's projects or clients.

A record must be maintained of all the requests, authorisations and rejections regarding the donations and sponsorships.

The Risk Department Officer must record in a precise way the amount and reason for each donation and sponsorship in WORLDSENSING'S books and registers.

In any case, the donation or sponsorship activity must be aimed at enhancing WORLDSENSING'S brand and business. Consequently, WORLDSENSING'S Marketing and Communication Area, under the supervision of the Risk Department, shall carry out specific communication actions so that all the donations and sponsorships are public among all the staff and towards third parties.

WORLDSENSING must also make sure that the donation or sponsorship in question is not used as a way of funding illegal activities in violation of the anti-money laundering and counter-terrorist financing legislation.

Any donations or sponsorships made by WORLDSENSING to non-profit organisations must not generate the slightest doubt or appearance about their suitability or appropriateness and they must obviously not breach any applicable legislation.

### 3. PROHIBITION OF POLITICAL CONTRIBUTIONS

WORLDSENSING forbids contributions in its name to political parties or related organisations and to political candidates.

No WORLDSENSING employees can directly or indirectly make or authorise political contributions in WORLDSENSING'S name or for any purpose related to WORLDSENSING'S commercial activity.

The Company's resources cannot be used for political contributions or activities.

No Company funds, properties or other resources can be used for making contributions or offering items of value to political candidates, political parties or party members.

The Company shall not reimburse any employees for any personal contributions made for political purposes. Everyone is free to participate in political activities in their spare time and on their own account, provided that this does not interfere with their duties at WORLDSENSING and is not done in the Company's name.

## ANNEX 2 - Protocol on training expenses

### 1. INTRODUCTION

WORLDSENSING is committed to advancement and innovation by investing in all the staff's professional development.

This protocol expands upon Worldsensing's Anti-Corruption Policy and its objective is to make sure that:

- Its employees have the necessary skills and knowledge to perform their current work at WORLDSSENSING.
- Its employees have sufficient opportunities to develop and enhance their skills and knowledge beyond their current role based on the future needs of an international technological and volatile company such as WORLDSSENSING.
- Its skill-building and development budget is allocated in a fair, equitable and equal way, administered through a standard procedure for all the WORLDSSENSING members.

### 2. PROCEDURE FOR ALLOCATING TRAINING EXPENSES - DECISION TREE

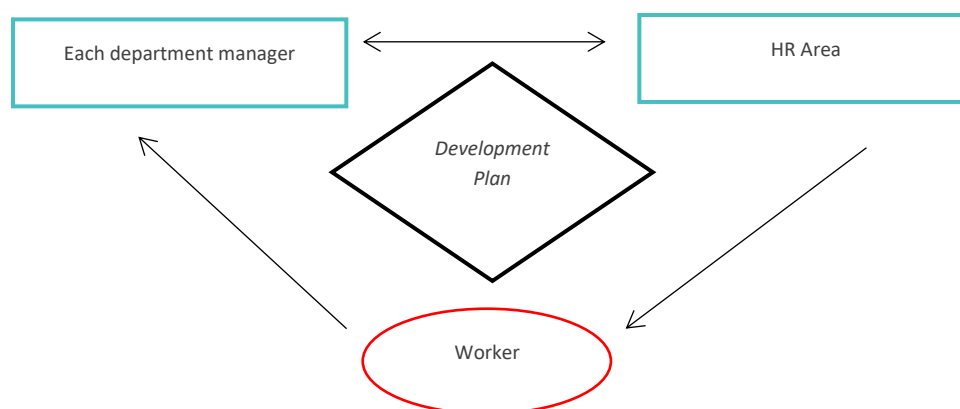
#### Staff training expenses at WORLDSSENSING:

Training expenses are considered to be the courses funded directly by WORLDSSENSING or co-funded in part by the Company employees' salary and in part by the Company itself.

WORLDSSENSING'S training expense system is based on the fact that all the WORLDSSENSING members have a Development Plan.

#### Allocation procedure

The procedure for allocating training expenses is initially drafted by the HR Area which makes the most appropriate decision in each specific case based on the advice from each manager of the area of which each worker forms part and their Development Plan.



The Development Plan is a programme that was implemented within the Company by the HR Area to encourage each WORLDSSENSING member to receive ongoing training, with the annual budget limit allocated by the Company for that purpose.

There are three types of situations:

- i) Courses which the Company demands from the workers and, since they are mandatory, are funded 100% by WORLDSENSING;
- ii) Courses not considered to be mandatory but which may be useful for the workers' future or cross-disciplinary training and which also seek their commitment, so they are co-funded by WORLDSENSING and the workers;
- iii) Courses requested directly by the workers, so they are also co-funded by WORLDSENSING and the workers.

When the requested courses have been allocated or accepted, the HR Area shall ensure that the course is being taken by receiving from the workers proof of their tests or certificates issued by the corresponding educational institutions.

When workers are denied access to any of those courses and the affected persons request the reasons, they shall be informed in writing of the reasons for that decision. The HR Area must be informed at all times of the requests made and rejected.

### 3. TRAINING FUNDED BY THIRD PARTIES

WORLDSENSING employees are expressly forbidden to receive training that is funded by third parties which are directly or indirectly related to WORLDSENSING and its businesses.

They are allowed to attend training sessions, courses and seminars which are free of charge in general.

## ANNEX 3 - Worldsensing's Protocol on Accepting and Giving Gifts

# Regulatory Compliance and Crime Prevention Model

## Protocol on Accepting and Giving Gifts

Drafted by		Approved by		Version	
Responsible body	Date	Responsible body	Date	ID	Date
Compliance Committee	11/03/2019	-	NA	1.0	11/03/2019
Compliance Committee	28/05/2019	CEO & CFO		1.1	28/05/2019

## 1. Introduction

The purpose of this protocol is to define the procedure that must be followed for:

- a) Accepting gifts, presents, invitations, etc., whether in cash or in kind, from third parties (suppliers, clients, intermediaries, Public Administrations or any third parties) by the employees, senior management and members of the governing body of WORLDSENSING.
- b) Offering gifts, presents, invitations, etc., whether in cash or in kind, to third parties by the employees, senior management and members of the governing body of WORLDSENSING.

## 2. Gift acceptance policy

As a general rule, **no employees, managers or members of the governing body of WORLDSENSING can request or accept any types of payments, gifts, presents, commissions or remuneration** from third parties with which they have professional relations (clients, suppliers, intermediaries, Public Administrations, etc.), whether they are legal or natural persons. That rule is applicable in general to all the employees and, in particular, to the company managers, whatever their activity area or hierarchical level, and the members of the governing body.

That **general prohibition** specifically includes **receiving any gifts** comprising cash and any gift cards or vouchers or equivalent to buy goods or services at any establishment.

Specifically, WORLDSENSING does not allow using gifts or presents of any type:

- i. In order to influence commercial and business relations, whether they are with clients or suppliers, in such a way that this creates an advantage, a differential treatment, a business expectation, the capacity to influence or an obligation (direct or indirect) to arrange contracts with them.
- ii. Which may affect in any way the professional activity of the employees, managers or members of the governing body of WORLDSENSING for them not to carry out their work or activity independently and objectively in the most favourable way for the interests of the company where they provide their services.
- iii. Which contravene any external and general legislation, rules and/or regulations or internal ones at WORLDSENSING.

Nevertheless, there are some **exceptions** regarding the prohibition to receive gifts: **gifts can be received provided that they are within reasonable limits and their value is not considered to be high or excessive**, as set out below.

The following are considered to be **acceptable gifts**:

- Habitual token and promotional presents of low economic value such as pens, agendas and notebooks.
- Invitations to professional meals and meetings, provided that they do not exceed the limits considered to be reasonable in social usage, depending on the hierarchical level of the employees or managers benefiting from the invitation.

- Invitations to sports events and other celebration or entertainment acts offered for legitimate commercial purposes such as building good will and improving relations with clients or suppliers, provided that they are accompanied by them.
- Gifts for special courtesies, for specific and exceptional reasons, and for consolidated and general customs and traditions, provided that the present is not in cash (including gift cards/vouchers which can be used as cash) and whose equivalent value is less than 50 euros per year for every gift giver. As an exception and because of the traditional practice of giving Christmas gifts, that limit goes up to 150 euros, provided that the goods obtained are raffled in a transparent way among the workers.

The gifts and presents that fall within the aforementioned exceptions shall only be accepted if they are voluntarily given by third parties and there is no reasonable probability that this will influence the beneficiaries' ability to make an objective judgment or their obligations to WORLDSENSING.

These rules are applicable regardless of whether the gifts are received at the beneficiaries' place of professional activity or home address.

Other supplementary gift acceptance guidelines which are mandatory for the employees, managers and members of the governing body of WORLDSENSING are as follows:

- It is forbidden to accept personal financial aid of any type provided by third parties with which WORLDSENSING has business relations, unless it comes from financial institutions carrying out their ordinary activity and not using exceptional or unique criteria.
- It is forbidden to attend sports events and other celebration or entertainment acts as a gift from a professional contact.
- Employees and/or any family members are not allowed to accept leisure trips or courtesies of any type that are paid by third parties with direct or indirect economic relations with WORLDSENSING.

### **3. Policy on giving gifts to third parties**

There are also prohibitions regarding the offering of gifts, presents and invitations, whether in cash or in kind, to third parties by the employees, senior management and Board of Directors of WORLDSENSING:

- a) Gifts to third parties (including invitations to sports events and other festive acts as guests of WORLDSENSING) can only be given as professional courtesy, provided that this practice is commonly accepted and the gift has a modest, public and reasonable economic value.
- b) The gift must not have a value that may influence the professional decision and/or provoke a dependent relationship or duty of reciprocity or give the appearance of committing a wrongdoing or providing a preferential treatment, a competitive advantage, a privilege, etc. The equivalent value of the gift given to a third party must not exceed 150 euros in any case.



- c) It is expressly forbidden to give gifts comprising cash or gift cards or vouchers which can be used as cash, regardless of their type, duration, terms of use, etc.
- d) No personal financial aid of any type is allowed to be provided to a client or other professional contact.

#### **4. Guidelines on how to act when receiving or giving gifts**

WORLDSENSING has also set out the action guidelines that must be followed when third parties offer or give any types of gifts, presents, invitations, etc.

The mandatory guidelines are as follows:

- a. Any types of gifts, presents, compensations, advantages and opportunities received from any third parties and which fail to comply with this policy must be rejected, apart from the specific exceptions defined for receiving gifts (less than 150 euros depending on the socially accepted customs and traditions). It is also forbidden to offer any types of gifts, presents, advantages, etc. to third parties which fail to comply with WORLDSENSING'S policy on accepting and giving gifts.
- b. If a gift is received that does not comply with the policy on accepting and giving gifts, the third party must be expressly and immediately notified that the gift, present, invitation, etc. cannot be accepted in accordance with that policy established by WORLDSENSING. In that case, the gift received must be expressly returned.
- c. The hierarchical superior must be informed of any gifts offered or received.
- d. The gifts received worth over 50 euros shall ALWAYS be made available to the Company, which shall distribute them among the employees through a draw or alternatively donate them to charity.
- e. As an exception, the gift can be accepted in WORLDSENSING'S name when there are circumstances justifying the acceptance such as the objective difficulty in returning it, its institutional, symbolic or protocol nature, etc. In that case, WORLDSENSING shall receive the gift that will be immediately donated either to a non-profit organisation or to third parties suitable for using it. In that case, the gift received will be accepted in WORLDSENSING'S name and the third party will be informed that it will be used for charity purposes.
- f. Any problems, incidents or doubts about the interpretation arising from implementing and complying with this Protocol must be notified to WORLDSENSING'S Compliance Committee.
- g. The rules and criteria contained in this Protocol are immediately applicable for all the employees and managers of WORLDSENSING.
- h. Failure to comply with this policy on accepting and giving gifts shall be considered an infringement of the internal mandatory rules, where failure to inform a hierarchical superior is an infringement and, therefore, it is included within the scope of the company's disciplinary power.

WORLDSENSING'S policy on accepting and giving gifts was drafted by the Compliance Committee at its meeting on 11 March 2019, was approved by the Company CEO on 29 May 2019 and shall be in force until its amendment or repeal is decided and notified.

<b>ACCEPTING GIFTS</b>		
<b>VALUE</b>	<b>STATUS</b>	<b>ACTION</b>
UNDER €50	ALLOWED	INFORM HIERARCHICAL SUPERIOR
UNDER €150	ALLOWED	INFORM HIERARCHICAL SUPERIOR
		DONATION TO COMPANY
OVER €150	FORBIDDEN	INFORM COMPLIANCE COMMITTEE

**[END OF DOCUMENT]**