

# **ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING POLICY**

**CUPA**GROUP  
Since 1892



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Cupa Group has decided to develop a policy to supplement the principles laid down in its Code of Ethics on the prevention of fraud, corruption and money laundering. To that end, Cupa Group undertakes to continue to work in the direction marked by the principles listed below to minimize the risks of specification and the possible negative effects of such behavior.

Compliance is obligatory for Cupa Group employees, directors, governing organs and collaborators whatever their location, hierarchical position in the organizational chart or the type of contractual relationship uniting them to the company, as well as for the different forms of administrative organs that manage the company and the members of those organs.

## Principles

- Everyone who forms part of the Cupa Group structure undertakes to work within a culture of regulatory compliance.
- As part of this culture, Cupa Group has a Compliance Management System to serve as a key tool for reducing and detecting these behaviors.
- Institute and maintain effective and efficient anti-fraud controls.
- All Cupa Group employees, and any person or entity acting on its behalf are forbidden to, offer, promise, , authorize, or accept delivery of an object of value or gift that is more than a mere courtesy.
- Cupa Group specifically prohibits any activity or behavior from anyone forming part of its structure that may constitute influence trafficking in relation to a public employee.
- Cupa Group does not finance any political party or any type of related foundation or association.
- Cupa Group is fully committed to preventing money laundering and the financing of terrorism throughout the world. It therefore adopts a position of full cooperation with the competent national or international authority fighting to combat such practices.



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