

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

CUPAGROUP
Since 1892



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.

The principles set out in this policy on the prevention of fraud, corruption and money laundering are as follows:

- Everyone who forms part of **CUPA GROUP**'s 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.



Javier Fernández
CEO Cupa Group
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