

# Anti-Bribery Guidelines



## 1. Scope

- 1.1. The Company adheres to both national and international legal and regulatory anti-corruption frameworks, conducting its operations with impartiality, honesty, transparency, and integrity. This commitment is essential for maintaining the trust of our employees, shareholders, business partners, and stakeholders. Ethics and maintaining a good reputation are integral to our business decisions and activities, recognized as crucial elements for effective management and sustainable growth.
- 1.2. These Guidelines outline the Company's measures to combat corruption risk, emphasizing the roles, responsibilities, principles, and behaviors expected within the broader context of corporate affairs.

## 2. What is Bribery?

- 2.1 Bribery encompasses the giving, asking, agreeing to, receiving, accepting, soliciting, or promising of a financial or other advantage to another party. This action is undertaken with the intention of inducing the other party to perform a specific function improperly, to cause them to omit an action either in the future or previously, to influence an action or decision, or to reward them for such actions. Additionally, bribery occurs when the acceptance of the advantage constitutes improper conduct.
- 2.2 Bribery is also considered to have transpired if any party requests or agrees to receive a financial, commercial, contractual, regulatory, personal, or other advantage directly or indirectly from another party. This is done with the intention of inducing the receiving party to perform a specific function improperly or to omit a relevant action. Moreover, bribery occurs when the acceptance of such an advantage represents improper conduct or when the party acts improperly in anticipation of receiving such an advantage.
- 2.3 Bribery involving public officials refers to the giving or promising (directly or indirectly) of a financial or other advantage with the intention of influencing the official to secure business or gain an advantage in business transactions. A public official encompasses: (i) officers or employees of governments, agencies, ministries, or their instrumentalities; (ii) officers or employees of government-owned or controlled entities; (iii) officers or employees of public international organizations; (iv) political party officials, candidates for political office; or (v) individuals holding legislative, administrative, or judicial positions, or performing public functions for a country or its agencies or enterprises (including, but not limited to, prime ministers, cabinet members, mayors, etc.).
- 2.4 Bribery concerning Sanctions refers to the giving or promising of a financial or other advantage involving governments of non-EU countries, companies, groups, organizations, or individuals subject to specific restrictive measures. These measures may include:
- Restrictions on admission (travel bans)
  - Asset freezes

- Other economic measures such as import and export restrictions
- Arms embargoes

### **3. Antibribery measures implemented By Qualco Real Estate**

#### **3.1 For Facilitation Payments**

- 3.1.1 A facilitation payment refers to a (small) payment made to officials to ensure or expedite the performance of routine or necessary functions.
- 3.1.2 Facilitation or similar payments may be made in exceptional circumstances only, such as when an employee's life is in danger, and under no other circumstances. In such cases, the following steps must be taken:
  - a. Keep the payment amount to the minimum.
  - b. Request a receipt whenever possible, detailing the amount and reason for the payment.
  - c. Document the payment with a record.
  - d. Notify the Compliance Department.

#### **3.2 For Conflict-of-Interest Cases**

- 3.2.1 Each employee and representative is required to promptly disclose any known or potential conflicts of interest as they arise.
- 3.2.2 In the event of an actual conflict of interest, all transactions possibly affected will undergo retroactive review. Both internal and external stakeholders, including but not limited to shareholders, directors, employees, and contractors, will be informed. Furthermore, an investigation will be conducted to ascertain the extent of the conflict and the intentions of the involved parties.
- 3.2.3 Qualco Real Estate has implemented a Conflict-of-Interest Policy and Procedures to effectively manage such cases. Qualco Real Estate is committed to providing continuous training and information regarding conflict-of-interest matters to its employees.

#### **3.3 For Gifts and Hospitality Requests**

- 3.3.1 Gifts and hospitality play a legitimate role in business dealings. However, when excessive, they may constitute bribery or present a conflict of interest. Therefore, caution and due diligence must always be exercised when giving or receiving any type of gift or hospitality on behalf of Qualco Real Estate or any of its subsidiaries.

### 3.3.2 Qualco Real Estate has adopted specific principles:

Qualco Real Estate has established specific principles regarding gifts and hospitality:

- Gifts and hospitality should not be offered or accepted as rewards, inducements, or encouragement for preferential treatment or unethical behavior.
- Gifts of low intrinsic value, such as diaries or calendars, typically considered symbolic or acts of courtesy, may be accepted from business partners, clients, or other stakeholders with whom employees regularly interact.
- Giving gifts requires prior approval through a specific process by the relevant departments.
- Cash should never be given or received as a gift under any circumstances.
- Gifts and hospitality to or from relevant parties should generally be avoided during contract tendering or awarding processes, or for a significant period after the completion of the selection process.
- Providing gifts or hospitality to family members or guests of commercial clients, business partners, or other third parties is generally inappropriate and should be avoided.
- Gifts and hospitality to or from government officials, representatives, politicians, or political parties are strictly prohibited.
- Hospitality in the form of business meals and entertainment should be infrequent, consistent with accepted local business practices, and aimed at furthering a business relationship. A representative from each entity must be present.
- The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous.

Employees are instructed to promptly inform the Compliance Officer if they are offered an award or prize in connection with their official duties

### 3.4 For Sponsorships and Charitable Contributions

3.4.1 As part of Qualco Real Estate's commitment to good corporate citizenship, the Company may approve sponsorships and encourages the donation to charities. This can include contributions of services, knowledge, time, or direct financial support, whether in the form of cash or other means. Qualco Real Estate also agrees to disclose all charitable contributions it makes.

3.4.2 Sponsorships are defined as covering the costs of a specific event or program as a form of advertising aimed at promoting the Company's communication and marketing objectives. The goal of sponsorship is to increase awareness of Qualco Real Estate's activities.

3.4.3 Charitable contributions are allowed exclusively to registered (non-profit) charities. No

charitable donations may be provided to any organization that is not a registered charity. Such contributions may include goods, services, technical assistance, or training.

- 3.4.4 Each proposal is individually assessed based on some or all of the following criteria, depending on the circumstances: (i) The purpose and objectives of the charity's stated activities. (ii) The geographic areas served by the charity. (iii) The organizational structure, including individuals with significant control. (iv) The donor and volunteer base of the charity. (v) For larger charities, funding, and disbursement criteria, including basic beneficiary information. (vi) Affiliation with other NGOs, governments, or groups.
- 3.4.5 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
- 3.4.6 Sponsorships or charitable donations must not be granted upon the request of any party if such sponsorship or donation could lead to improper conduct.

### 3.5 Political Donations

The Company and its subsidiaries refrain from making political donations, and the Company does not have any affiliation with political parties, independent candidates, or any other organizations primarily engaged in political activities.

## 4. Communication and Training

- 4.1 Qualco Real Estate has implemented an effective Whistleblowing Policy and Procedures to facilitate the submission of anonymous reports and information at all levels. This initiative aims to enhance transparency and ensure compliance with the existing legislative and regulatory framework. For more information, please visit our Whistleblowing Platform at [Whistleblowing Platform \(convercent.com\)](https://convercent.com)
- 4.2 All Qualco Real Estate's employees receive regular, relevant training on how to implement and adhere to the Antibribery Framework.