

**SPCC HOSPITALITIES, GIFTS AND COURTESIES POLICY**  
**(Public extract)**

At SPCC we establish measures to mitigate the risk of corruption and/or bribery through the offer and/or receipt of Hospitalities, Gifts and Courtesies. These actions, besides potentially qualifying as a crime, can create conflicts of interest that may result in economic, legal, and reputational consequences.

Our guidelines aim to provide a framework of action in dealing with behaviors that may qualify as a crime or create a potential, apparent, or real conflict of interest.

**WE ARE COMMITTED TO:**

1. Provide the necessary guidelines to manage the correct treatment of hospitality, gifts and courtesies received by SPCC staff, as well as those that SPCC may provide.
2. Identifying those hospitalities, gifts, and/or courtesies that can be offered without creating a risk situation, establishing: (i) reasonable amounts, (ii) appropriate context, and (iii) mechanisms for a transparent environment. Likewise, identifying the hospitalities, gifts, and/or courtesies that are prohibited due to: (i) amounts, (ii) scenarios, (iii) type of content, and (iv) other factors.
3. Implementing measures with minimum levels for offering and limits for authorization. Also, prohibiting the offering/receiving of hospitalities, gifts, and courtesies to/from public officials, with any exceptions needing review by SPCC's Compliance Officer.
4. Disseminating the mechanisms to obtain the required approvals for offering or receiving hospitalities, gifts, and courtesies.
5. Promote consultation channels, constant monitoring of the receipt and offering of Hospitalities, Gifts, and Courtesies, as well as providing tools in case behaviors contrary to those established in the policy are detected.

All SPCC workers are subject to this policy.