

Policy on Gifts, Presents, Invitations, and Hospitality





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1. Objective

The **Majestic Hotel Group**¹ (hereinafter also the "MAJESTIC GROUP" or the "Organization"), within the framework of its anti-corruption policy, has developed this Policy on Gifts, Presents, Invitations, and Hospitality, which is governed by the principles and values contained in the organization's Code of Conduct, especially the principles of legitimacy, proportionality, and transparency.

In the business world and, more specifically, in the hotel sector, in order to strengthen and foster commercial relationships it is common to allow certain practices between agents in the sector, although, to make them more legitimate and to avoid any corrupt conduct, they must be regulated and adapted to the internal regulations of the organization, as well as to the current and applicable legislation.

With this policy, the **MAJESTIC GROUP** defines the guidelines for action that should be followed by all members of the organization when it comes to offering or accepting gifts, presents, invitations, and hospitality.

2. Scope

This policy is of a corporate nature and compliance is mandatory by all members of the organization, regardless of their role or duties.

The members of the organization must respect this policy in their commercial and professional relationships with business partners and third parties as it serves as a guide to avoid becoming involved in conflicts of interest and to provide clarity in the decision-making process in regards to offering or accepting gifts, presents, invitations, and hospitality when acting on behalf of the organization.

¹ Hereinafter the "Majestic Group" or "Organization" refers, without distinction, to INMA, S.L. and to its subsidiaries (Clavisa S.A., Valisa S.L., Murmuri Rambla S.L., Majestic Sport S.L., and Majestic Hotel SPA S.L.), and to any other company that may in the future could become a direct or indirect subsidiary.



3. Definitions

For the purposes of this document, and for the better understanding of the same, a series of concepts have been established that, given their relevance, it is necessary and convenient to take into account and define. All without prejudice to the legal definition established for each of these concepts by the legislation applicable to the organization in each area of action, as well as the definitions for identical concepts that can be found in other internal rules from the **MAJESTIC GROUP**.

3.1 Criminal Compliance Body

Deliberative body responsible for *compliance* functions within the **MAJESTIC GROUP**. Hereinafter, also the CCB.

3.2 Conflicts of Interest

A situation in which personal, political, family, financial, or external business interests could interfere with the judgment of members of the organization while they are carrying out their duties within the same.

3.3 Corruption Among Businesses or Individuals

An act that, in itself or through a proxy, involves receiving, soliciting, accepting, promising, or offering an unjustified benefit or advantage of any kind or nature, by directors, administrators, employees, trading company associates, or business partners, for themselves or for a third party, as compensation for the undue favor of another in the acquisition or sale of goods, or the contracting of services or in commercial relations, regardless of their location.

3.4 Civil Servants



Any person who exercises a public role, including in a public body or a public company, and any official or agent of a national or international public organization, as well as all people that hold a legislative, administrative, or judicial post, by election, appointment, or succession.

3.5 Invitations and Hospitality

Any attention, generally of a social nature, that is offered or received in the context of commercial relations.

NOTE 1 It will be understood that invitations and hospitality include lunches, dinners, nights in a hotel, and tickets to theater or sporting events, among others.

3.6 Members of the Organization

The members of a governing body or administration, directors, employees, temporary workers, employees under collaboration agreements, and volunteers, as well as the any people acting under hierarchical subordination to any of the above.

3.7 Gifts and/or Presents

Anything of value that is given or received openly and transparently, as a symbol of gratitude.

3.8 Business Partners

Any party, except the members of the organization, with whom the organization has, or plans to establish, any type of business relationship.

NOTE 1 Business partners include, but are not limited to, clients, *joint ventures*, partners in *joint ventures*, consortium partners, contractors, commission workers, consultants, subcontractors, suppliers, vendors, consultants, agents, distributors, representatives, intermediaries, and investors.



3.9 Third Parties

This includes business partners and any person or body separate from the organization.

4. Acceptance Criteria

4.1. Accepting Gifts and/or Presents

The **MAJESTIC GROUP** accepts that, on occasion, members of the organization may accept gifts and/or presents within the scope of their commercial relationships with business partners and third parties, provided that the following requirements are met:

- a) The principles and values of the Code of Conduct are not violated;
- b) They are food products or corporate gifts considered a mere social courtesy;
- c) They have an occasional character, that is to say, they are not continuous;
- d) They do not have the ability to influence decision making;
- e) Their value would be considered as a luxury by society;
- f) They do not come, directly or indirectly, from civil servants or national or international authorities; and
- g) They are delivered and accepted with transparency.

Any gift and/or present that is in breach of the above requirements may not be accepted or solicited, directly or indirectly, for the benefit of oneself or of a third party. In any case, gifts and/or presents cannot be accepted or solicited, directly or indirectly, when:

- a) They are money, gift cards, vouchers, or any other medium that can be transformed into money;
- b) Their value is greater than 200 euros or its equivalent in the local currency (either individually or the joint value of several gifts received within a one-year period);
- c) The receiving party knows that gifts and/or presents are prohibited by the organization of which the proffering party is a member;
- d) They are given as a bribe, compensation, or undue commission.

4.1.1. Special Regulations Regarding Tips

The MAJESTIC GROUP accepts that members of the organization may receive tips while performing their normal and legitimate duties, as it is understood as a social custom for the client to leave a gratuity depending on their degree of satisfaction with the service provided.

Nonetheless, the tips received by members of the organization will be turned in to the MAJESTIC GROUP to be managed, distributed, and supervised in full compliance with the applicable regulations.

4.2. Acceptance of Invitations and/or Hospitality

In the hospitality industry, invitations and/or hospitality are common and represent a manner of promoting commercial activity with business partners and third-party agents in the sector. Consequently, the members of the organization can only accept these if they are linked to a legitimate business purpose, and always providing that they meet the following criteria:

- a) The person extending the invitation and/or hospitality attends as well;
- b) They are occasional, that is to say, they are not frequently repeated;
- c) They take place in locations that are appropriate for business, not in locations that could cause reputational damage to the organization; and
- d) They are reasonable, appropriate, and linked to a legitimate business purpose.

Invitations and/or hospitality that violate the above criteria may not be accepted or requested, directly or indirectly, for the benefit of oneself or of a third party. Under no circumstance should an invitation and/or hospitality be accepted, directly or indirectly, when:

- a) It is provided with the intention of influencing decision making or obtaining preferential treatment;
- b) It may be seen as excessive in the context of the commercial relationship;
- c) It involves the attendance of relatives of members of the organization, including the spouse or the person that they live with in an equivalent relationship and relatives within the second degree of consanguinity or affinity; or
- d) It is prohibited by the organization of which the proffering party is a member.

5. Criteria for Offering

5.1. Offering Gifts and/or Presents

The **MAJESTIC GROUP** accepts that, on occasion, members of the organization may offer or give gifts and/or presents to physical people, directly or indirectly related to business partners and/or third parties, for legitimate business purposes, as long as the following requirements are met:

- a) The principles and values of the Code of Conduct are not violated;
- b) They are food products or corporate gifts considered a mere social courtesy;
- c) They have an occasional character, that is to say, they are not continuous;
- d) They do not have the ability to influence decision making;
- e) Their value would be considered as a luxury by society;
- f) They are not destined, directly or indirectly, for civil servants or national or international authorities, including the spouse or the person that they live with in an equivalent relationship and relatives within the second degree of consanguinity or affinity; and
- g) They are given with transparency.

Any gift and/or present that is in breach of the above requirements may not be offered or given, directly or indirectly, for the benefit of oneself or of a third party. In any case, gifts and/or presents cannot be offered or given when:

- a) They are gift cards, vouchers, or any other medium that can be transformed into money;
- b) Their value is greater than 200 euros or its equivalent in the local currency (either individually or the joint value of several gifts received within a one-year period);
- c) The receiving party knows that gifts and/or presents are prohibited by the organization of which the proffering party is a member;
- d) They are given as a bribe, compensation, or undue commission.

5.2. Offering Invitations and/or Hospitality

In the hospitality industry, invitations and/or hospitality are common and represent a manner of promoting commercial activity with business partners and third-party agents in the sector. Consequently, the members of the organization can only offer these to physical people, directly or indirectly related to business partners or third parties, if they are linked to a legitimate business purpose, and always providing that they meet the following criteria:

- a) The member of the organization that is offering the invitation and/or hospitality is always present;
- b) They are occasional, that is to say, they are not frequently repeated;
- c) They take place in locations that are appropriate for business, not in locations that could cause reputational damage to the organization;
- d) They are not destined, directly or indirectly, for civil servants or national or international authorities, including the spouse or the person that they live with in an equivalent relationship and relatives within the second degree of consanguinity or affinity; and
- e) They are reasonable and appropriate for the legitimate business purpose they are pursuing.

Invitations and/or hospitality that violate the above criteria may not be offered, directly or indirectly, for the benefit of oneself or of a third party. Under no circumstance should an invitation and/or hospitality be offered when:

- a) It is provided with the intention of influencing decision making or obtaining preferential treatment on the part of a business partner or third party;
- b) It may be seen as excessive in the context of the commercial relationship; or
- c) It is prohibited by the organization of which the receiving or intended party is a member.

6. Procedure for Receiving or Offering Gifts, Presents, Invitations, and Hospitality

6.1 Communication Procedure

Members of the organization that accept, give, receive, or offer gifts, presents, invitations, and hospitality must:

- a) Not accept, solicit, offer, receive, or give any gifts, presents, invitations and/or hospitality that does not comply with the requirements established in this policy.
- b) If they find themselves in a controversial situation, they must expressly notify the third party and return what they have given, whenever possible. If returning it is impossible, they must report it to their superior as well as to the Criminal Compliance Body.
- c) Inform the Criminal Compliance Body if any of the following circumstances arise:
 - i. It is from or destined for civil servants or national or international authorities, including the spouse or the person that they live with in an equivalent relationship and relatives within the second degree of consanguinity or affinity;
 - ii. It is received, given, or offered regularly or frequently, in which case the Criminal Compliance Body will analyze its acceptability.



7. Queries and Reporting Non-Compliance

In the case of any doubt on the part of any member of the organization about accepting, giving, receiving, or offering any gifts, presents, invitations, and/or hospitality, they must contact the Criminal Compliance Body.

In the event of non-compliance with this policy, that non-compliance must be reported to the Criminal Compliance Body through any of the channels that the organization has made available, which will then proceed in accordance with the internal regulations approved in this regard.



8. Document Management Record

This version of the Policy on Gifts, Presents, Invitations, and Hospitality has been approved by the administrative body and will come into effect on the dates indicated in the boxes at the end of the document.

Any subsequent modifications, annexes, or extensions will be marked by the date of their respective approval and their effective date.

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Review: 2.0

Drafting	Author	Department	Signature	Date

Review	Reviewed by	Department	Signature	Date

Approval	Approved by	Department	Signature	Date
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