

ANTI-CORRUPTION AND BRIBERY POLICY

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1. The purpose of this policy

Camper is committed to conducting business in an ethical and honest manner, and to implementing and enforcing systems that ensure bribery and corruption are prevented. We have zero-tolerance for bribery and corrupt activities and are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever the country we operate in.

This policy reinforces Camper's position against Bribery and Corruption addressed in our Code of Conduct and Ethics and should serve as a guideline for all stakeholders, enabling them to recognize and appropriately manage any situations that might involve corruption or bribery.

2. Who it applies to

This document is binding in nature and of global application to all companies of the Camper Group, NNormal and Casa Camper -hereinafter referred to indistinctly in this document as "Camper" or "Company", regardless of the position they hold, their geographical location or the legal form by which they are linked to the company; It also applies to those people who carry out their activity for Camper through other companies, such as workers from temporary employment agencies, and in general, workers from any contracted or subcontracted company.

3. Definitions

3.1 Bribery

Bribery involves offering, giving, receiving, or soliciting something of value as a means to influence the actions of an individual or organization.

3.2 Corruption

Corruption refers to dishonest or unethical conduct by a person entrusted with a position of authority, often to acquire personal benefit.

3.3 Facilitation payments

Facilitation payments are unofficial fees given to officials to perform or speed up the jobs they are supposed to do.

3.4 Money Laundering

Money laundering is the process by which people try to make the sources of their illegal funds look legitimate. We must all look out for illegal customer or supplier financial transactions for the purposes of money laundering.

3.5 Conflict of interests

A conflict of interests is anything that interferes with your ability to make objective business decisions, especially personal relationships or investments.

4. Commitments

Camper has a zero-tolerance approach to bribery and corruption. We conduct all our business activities with honesty and integrity and are committed to maintaining a culture of transparency and accountability.

4.1 Within our organisation

- We should never engage in any form of bribery, whether it involves a public official or a private entity.
- Facilitation payments, or "grease payments," are strictly prohibited, regardless of local practices or customs.
- We are responsible for all business records in our daily work. Business records include any information or communication in paper or electronic form that are maintained in the course of business, such as emails, project plans, purchase orders or contracts. This is property of the company (and will remain so even if we decide to leave the company).
- Never accept or provide gifts or entertainment with the intention of influencing a decision or that are in exchange for business, services or confidential information. Any gift given or accepted must be modest in value, infrequent and have a reasonable business purpose.
- There are other actions which can create conflicts of interest. Having a conflict of interest is typically not breaking the Code of Conduct and Ethics but failing to disclose it is.
- We are not actively involved in lobbying, and we are politically neutral with no party-political affiliations. We will never attempt to improperly influence any government official or policy maker to gain a business advantage. We do not make political donations.

- We have a full disclosure policy regarding our donations and sponsorships. Entities, amounts and frequency of donations are clearly defined in our [Donations and Sponsorships Policy](#) and made public in our yearly Sustainability Report.

4.2 Across our value chain

- As defined in our [Procurement Guidelines](#) all our Intermediate and Significant suppliers are required to adhere to our [Suppliers Code of Conduct](#).
- Significant suppliers are, in addition, required to complete our ESG questionnaire (self-assessment) which addresses specific requirements regarding the prevention of bribery and corruption.
- We must all look out for illegal customer or supplier financial transactions for the purposes of preventing money laundering.
- We have made available, to all stakeholders, a confidential grievance mechanism handled by a third party, detailed information about this channel can be found in section 5. What to do if a breach is detected.

5. What to do if a breach is detected

In the event that any employee or third party suspects that this Policy is not being complied with or that there are breaches that go against the principles established in this document, they may inform their immediate superior or use the Whistleblower Channel tool.

For these purposes, the company makes available to stakeholders a whistleblower channel tool managed by a third party, available at <https://report.whistleb.com/en/camper> or on the intranet, which guarantees the confidentiality of the complaint, unless the complainant expressly and voluntarily provides the contact information and authorizes its use, or when it is essential to continue with the complaint process.

The Whistleblower Channel Policy and the Whistleblower Channel Procedure, available on the Intranet, describe the procedure to be followed by staff members to report misconduct, or suspicions thereof, and the manner in which the report will be handled. The Whistleblower Channel also describes the safeguards for staff members regarding confidentiality and its protection.

Retaliation of any kind against staff members who have reported a violation or potential violation in good faith will not be permitted and we will ensure that confidentiality is maintained and no disciplinary action against staff who have reported such a violation is taken.

6. Other resources

This policy is aligned with our:

- [Code of Conduct and Ethics](#)
- [Suppliers Code of Conduct](#)
- [Donations and Sponsorships Policy](#)
- [Policy on the prevention of Money Laundering](#)
- [Whistleblower Channel Policy](#)
- [Whistleblower Channel Procedure](#)

7. Governance

The Compliance Committee is responsible for the monitoring and updating of this policy and will ensure that all employees are provided with regular training on anti-corruption and bribery good practices.

We will conduct regular external audits to ensure compliance with relevant regulations and implement corrective measures when necessary.

Violations of this policy may result in disciplinary action, up to and including termination of employment or business relationship. Legal action may also be pursued where appropriate.

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