

C O R P O R A T E
G I F T S
P O L I C Y

Europamundo 
vacaciones



Índice

1. Introduction.....	1
2. Scope of application.....	2
3. Goals of the Policy.....	2
4. Requirements for gifts.....	3
5. Limits on gifts.....	3
6. Gifts registry.....	4
7. Procedure for receiving unacceptable gifts.....	5
8. Reporting of non-compliance.....	5
9. Investigation of non-compliance.....	6
10. Policy review.....	6
11. Declaration of compliance.....	6
12. Approval, entry into force and updating.....	7
Annex I – Gift authorization request form.....	9
Annex II – Model request form.....	10

1. Introduction.

This Gift Policy of Europa Mundo Vacaciones S.L.U., hereinafter Europamundo, is aligned with the ethical values of Europamundo and its Group JTB Corporation, ratifying its firm desire to maintain conduct that respects both the rules and ethical standards, and defines a framework of principles of behaviour in this area of activity.

"Exchanges of small gifts and hospitality are normal courtesies between trade associations and colleagues, and may in no case be given, offered or received with the intention or the prospect of influencing decision-making or other conduct.

The line between permissible gifts and bribery is a fine one. But the main difference between the two is that bribery jeopardises the making of an objective decision or the proper performance of a function. In the case of bribery, the donor usually expects some kind of unduly favourable treatment from the recipient in return for his or her gift or hospitality".

For more information on what is permitted and what is not, please refer to the JTB Europe and Europamundo Anti-Corruption Regulations: [JTB Compliance Policy](#), [JTB Code of Conduct](#), [Europamundo Compliance Programme](#), (under construction).

Europamundo strongly condemns any corrupt practice that, in addition to contravening the applicable legal provisions, is contrary to its ethical principles and values.

In this regard, this Policy establishes a basic framework for compliance in anti-bribery matters in accordance with the provisions of the international standard UNE-ISO 37001, on anti-bribery management systems or the Europamundo Compliance System, hereinafter referred to as Europamundo Compliance.

2. Scope of application.

This Policy is mandatory and applicable at Europamundo and is binding on all personnel, regardless of the position they hold.

It is the responsibility of the person in charge of the Compliance Officer (hereinafter CO) and the Compliance Committee to ensure proper compliance with this Policy. However, the responsibility to comply with ethical rules and standards is the responsibility of the entire Organisation and, therefore, of each and every one of its Members, without exception.

3. Goals of the Policy.

Through this Policy, Europamundo seeks to:

- i. Develop the provisions of this document, which reflects that Europamundo does not accept or offer, either directly or indirectly, any type of advantage of a dubious nature for the purpose of obtaining an economic or commercial benefit and that none of its personnel should accept or offer any type of prize, gift, hospitality or favourable treatment for these purposes.
- ii. To ensure that all Europamundo personnel comply with the provisions of the main anti-bribery regulations existing in the markets in which it operates, establishing a basic framework of compliance aligned with the international standard UNE-ISO 37001, on anti-bribery management systems, as well as the Europamundo Compliance system or the JTB Europe anti-corruption regulations.

4. Requirements to be met by gifts.

Notwithstanding the above, Europamundo staff may receive gifts provided that the following requirements are met:

- That they are in accordance with local, regional, national and international laws.
- That they do not contravene the provisions of the Europamundo Manual of Good Practices.
- That they are not made with the intention of influencing a third party, or to obtain or maintain an undue advantage, benefit or business.
- They are not made to obtain or exchange favourable treatment.
- They must not be made to offer or obtain personal favours, even though they do not consume company resources or take place in the context of the company's activities.
- That it does not constitute the receipt, offer or solicitation of a gift that could be perceived as a bribe, whether in the public or private sector.
- They must not give rise to a conflict of interest.
- That they are not in cash or any other medium that allows the transmission of money, which are expressly prohibited. An exception is made for tips received by guides in the course of their tours.
- That they are received in a public, open and transparent manner and, under no circumstances, in the private home of the person receiving the gift.
- That in no case exceed, without authorisation, the limits indicated in section 5.
- That, when appropriate, they are duly registered as indicated in section 6.

5. Limits on gifts.

In line with JTB's anti-corruption policy, the table below sets out the limits for

receiving gifts and hospitality for any person employed by Europamundo. These limits are designed to provide you with a guide as to what may be appropriate. The limits reflect the maximum value of a gift or hospitality you are entitled to receive, up to a maximum of 5 occasions per calendar year.

On each occasion you should identify:

- the country in which you are considering accepting gifts or hospitality. The guidelines in this on appropriate limits set out different limits for the different regions in which JTB Europe Group and Europamundo operate.

Region	Western Europe, North America, Australia and New Zealand, UAE, Hong Kong and Singapore	Central and South America, Eastern Europe, Rest of the Middle East and South Africa	Rest of Africa and rest of the world
Donor	EUR 130	EUR 95	EUR 65

For hierarchical levels within the Board of Directors, the limit for receiving gifts and hospitality is EUR 435 per occasion, up to a maximum of 5 occasions per calendar year.

The limits do not apply to the receipt of:

- educational and familiarisation trips;
- discounted or free travel and accommodation (including breakfast) on business trips, provided that the class of service and/or class of accommodation provided is in accordance with the travel policy to which you are subject;
- free or discounted training related to your role, up to a maximum of 5 occasions per calendar year and external business partner;

Acceptance of gifts above these limits must be authorised in writing, in accordance with the model provided in Annex I, by the Compliance Officer or Compliance Committee.

The receipt of gifts above this limit is not acceptable, and the procedure set out

in section 7 must be followed, with the sole exception of possible acts of institutional representation at the highest level or the limits set out in this point 5 do not apply.

Below this limit, gifts may be accepted without authorisation.

Europamundo staff shall hand over all gifts received to the Human Resources Department for the purpose of drawing them, in the event that they exceed this limit.

6. Gifts registry.

All Europamundo personnel are required to declare all gifts received or offered in a register, where the above limits are exceeded, with the only exceptions below:

- i. merchandising items, unless their valuation is manifestly higher than what should reasonably be expected from mere politeness.
- ii. gifts, meals or events that are held for business purposes of Agreements and Business Relationships, within the limits and exceptions set out in paragraph 5.
- iii. the limits provided for in paragraph 5 which do not apply.

For each gift received or offered, the economic value, as well as the identification of both the receiver and the giver, and the company or entity to which they belong, must be recorded in the register. In addition, the identification of the authoriser and the reason for the authorisation must be stated. The destination of the gifts received must also be stated, in accordance with the provisions of section 7.

The record should be kept in an Excel or similar file, which allows the accumulation of amounts for what is received, according to the format suggested in **Annex II**.

7. Procedure for receiving unacceptable gifts

Any gift received that exceeds or contravenes the above must be immediately returned or refused.

If it is not reasonably possible to return the gift, it will be handed over to the HR Department which, after issuing the corresponding receipt, will allocate it to social interest purposes.

8. Reporting of non-compliance

Any Europamundo Staff member, in the event of detecting a breach of this Policy or having doubts as to whether any observed practice may constitute a breach of this Policy, should immediately contact the person in charge of the CO or the Europamundo Compliance Committee, through any of its channels of communication:

- E-mail: canaldedenuncias@europamundo.com
- Phone: 673463531 (Pedro Damian Cano Borrego as a Compliance Officer)
- Physical mailbox for the Complaints Channel: Located in the dining room
- Mailing Address:
EUROPA MUNDO VACACIONES S.L.U.
Attention: Complaints channel
C/ GARCIA DE PAREDES, 55
28010 – MADRID

The information transmitted through these channels is confidential, as is the identity of the reporting persons, whom Europamundo thanks for their cooperation and guarantees that there will be no reprisals.

In addition, the CO may act on its own initiative to investigate any indication of non-compliance with this Policy.

9. Investigation of non-compliance

It is the responsibility of the CO to investigate reported allegations of gift-giving, reporting to the HR Department or to the Heads of the Departments concerned, so that corrective action can be taken as necessary.

Europamundo will react immediately to breaches of the provisions of this Policy, within the parameters established by current legislation.

It is also the responsibility of the CO to report directly to Management on the results of these investigations, as well as on the implementation and continuous improvement of this Policy.

10. Policy review

The person holding the position of CO will be responsible for ensuring that the implementation of and compliance with this Policy is monitored periodically.

He/she will also be responsible for promoting actions for its appropriate dissemination and knowledge.

Monitoring of the Policy includes (i) oversight of the integrity of gift and hospitality records, (ii) whistleblowing procedures, (iii) periodic reviews of the effectiveness of staff training on these issues, (iv) reporting and recording of incidents related to this Policy, and (v) review of the updating of Gift Policy.

11. Declaration of compliance

As compliance with ethical norms and standards is a commitment for all Europamundo personnel and a strategic objective for Europamundo, each Member of the Organisation is expected to be aware of and respect the contents of this Policy.

12. Approval, entry into force and updating

The first version of the Gift Policy was approved by Management in May 2023 and will be effective as of that date.

This Policy must be kept up to date over time. To this end, it must be reviewed on an ordinary basis, on an annual basis, and on an extraordinary basis, whenever there are changes in the strategic objectives or in applicable legislation.

The CO is responsible for assessing any proposal for modification, with the support of the Compliance Committee.

They must also be submitted to Management for approval.

Madrid, 31st May 2023

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke at the bottom.

Signature:

Alejandro de la Osa Castro

CEO of Europa Mundo Vacaciones S.L.U.

ANNEXES:



Annex I- Gift authorization request form

Name and surname of the applicant				
Position and department to which you belong				
Full description of the gift (specify if accepted by the applicant)			Accepted by the applicant	
Name and position of the person issuing the gift and company to which he/she belongs	Name:			
	Position:			
	Company / entity:			
Total or estimated cost of the gift				
Justification of the gift				
In case the gift is linked to an event organised by Europa Mundo Vacaciones or to a Europamundo celebration, please provide the corresponding details and region of the donor				
Date of the gift				
Authorised				
Yes		No		Date
Signature, Name and surname				

Annex II – Model request form

Registration No.	Date	Received	Sender / Department- -Company	Recipient / Department-	Concept	Estimated cost	Who? (if applicable)	Justification (if applicable)	Destiny: HRR / MANAGEMENT/ /OTHERS

