

ANTI-BRIBERY AND GIFTS AND ENTERTAINMENT POLICY

Changes and Updates

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Approvals

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1. INTRODUCTION

Allfunds Bank S.A.U. and Allfunds Bank International, SA, including its branches, subsidiaries and representative offices (hereinafter, the "Allfunds Group", the "Group", the "Entity" or "Allfunds") through this Antibribery and Gifts and Entertainment Policy (hereinafter, the "Policy"), attached to the General Code of Conduct of Allfunds, aim to highlight the Group's commitment to comply with existing laws and the principles of legality, both nationally and internationally level, in terms of preventing bribery and thus ensuring transparency in commercial relations.

1.1. Objectives and Scope of Application

Through this Policy, Allfunds seeks to clearly establish the criteria and principles of action that must be followed by the Persons Covered in any of their professional relationships related to Allfunds, to ensure compliance with Anti-Bribery Regulations and specifically, in the matter of gifts, invitations, commissions, remunerations, incomes or benefits in each case.

This document is an annex to the Entity's Code of Conduct. In its relationship with its customers, suppliers, employees and the community in which it operates, Allfunds will apply the ethical values contained in the Code of Conduct, as well as those established in this Policy.

1.2. Level of Procedure

The contents of this Policy will prevail over any internal rules that might contradict it, unless said rules establish more stringent requirements of conduct.

In no case may the application of such content lead to a breach of the legal provisions applicable. Should such circumstances arise, the content must be adapted to the applicable legal provisions.

2. GENERAL STANDARDS

The ethical criteria and values underpinning the relationships between all members of Allfunds and third parties¹ are the same regardless of their position within the Group and the role they play in each of the situations that emerge.

Allfunds prohibits Persons Covered from:

¹ Including other employees, customers, suppliers, intermediaries, consultants and any other counterpart or third party with whom it is related.

- Offering, giving, promising, paying or accepting, directly or indirectly, an illicit benefit (whether or not economic) in exchange for obtaining an unlawful advantage or maintaining a business, whether it is with an official or public authority or It deals with an employee or representative of a company in the field of their professional relations or in relation to the activities carried out in the context of their work.
- Authorize any person to offer, give, promise, pay or accept, directly or indirectly, an illicit benefit (whether or not economic) in exchange for obtaining an unlawful advantage or maintaining a business, whether with an official or public authority as if it were an employee or representative of a company in the field of their professional relations or in relation to the activities carried out in the context of their work.

In this sense, the delivery, request or acceptance of any type of gifts, invitations, commissions, remunerations, incomes, advantages or benefits not authorized by the procedures established by the Group is prohibited, as well as taking advantage of the position held in the same for own benefit.

Any action aimed at conducting activities stated in this Policy must previously have been analysed by the receiving or issuing employee to verify that all its elements are in keeping with the principles stipulated in the Code of Conduct, the contents of this document and the contents of Anti-Bribery Regulations that might apply.

Likewise, when carrying out the activities indicated in section 3 of this Policy, the department involved in such activities will be responsible for carrying them out in accordance with this Policy and other internal regulations that may be applicable in the relative to the way to materialize and execute them.

2.1. OFFICIAL AND PUBLIC AUTHORITIES

Relations with public authorities that may create a situation of potential risk for the Group need to be taken into consideration, since Allfunds could be held responsible for a bribery case, perpetrated or attempted, with a public official, to the power, these last, request undue benefits to act in a way that does not comply with its obligations or in violation thereof. This type of situations include, among others, any interaction with public authorities as a consequence of an audit, inspection, consultation, etc. carried out by a public authority or any dispute or litigation against public authorities, either directly or indirectly.

Special mention to specific restrictions established in certain jurisdictions should be especially taken into account, when the offer or delivery of gifts, invitations, fees, remunerations, incomes, advantages or benefits is addressed to any public official. As a result, no activities that contain any element contravening these rules should be conducted. Any situation that might raise a doubt in respect to the applicable legal provisions should be consulted through the Regulatory Compliance Unit (regulatorycompliance@allfundsbank.com).

2.2. THIRD PARTIES

All the relationships that Allfunds or the Persons Covered maintain directly or indirectly with third parties during the course of the business or the performance of their work must be done according to the criteria of maximum correction, transparency and traceability of the information, as well as in compliance of this Policy, the Anti-Bribery Regulations and any other applicable regulations, in order to avoid any potential situation that may entail a risk for the Group of being responsible for a case of bribery business.

Likewise, all the Persons Covered must take into account the compliance with this Policy when carrying out the supplier selection procedure.

2.3. FACILITATION PAYMENTS²

The Group prohibits, as a general rule, routine or facilitation payments, and Persons Covered may not use such payment methods under any circumstances. However, if an "informal" payment is requested as a "facilitation payment" on behalf of Allfunds in one of the countries where such practices are socially accepted and customary, the Subject of the Code will immediately inform its superior, the Chief Financial Officer and the Regulatory Compliance Unit. In order to avoid misunderstandings and a potential risk for the Group, the Regulatory Compliance Unit will analyse whether or not there is a local prohibition or social enforcement of such practice and, consequently, will authorize said payment or not, which in any case will be limited to an amount of scarce value.

2.4. SPONSORING ACTIVITIES

Allfunds is aware that any conflict of interest related to a sponsoring activity could pose a bribery risk for the Group. For this reason, all the sponsoring activities that are to be carried out should have as their sole purpose the institutional promotion of the brand and the creation of a positive reputation for the Group.

These sponsoring activities will be previously carefully analysed by the Marketing department or any other department that will carry them out and approved by the General Management. In case of doubt, the Regulatory Compliance Unit will be consulted.

All sponsoring activities must be stipulated in writing, defining the nature and purposes of said activities, as well as the remuneration, which must be reasonable and real in comparison with the services provided.

In any case, both Allfunds and the beneficiary entity of the sponsoring must comply with the provisions of this Policy and with the applicable Anti-Bribery Regulations, accepting that the agreement may be terminated in case of violation thereof.

² The facilitation payments are small payments to expedite acts of procedure.

2.5. GIFTS AND ENTERTAINMENT

Only gifts or invitations offered or received by the Entity or by a Person Covered that suppose an act of courtesy are allowed, provided they have a modest value, are received or made in good faith, are consistent with the standards of business courtesy normally accepted or for promotional purposes and in all cases comply with the Anti-Bribery Regulations and other local regulations that may be applicable. In this sense, the Group has developed in section 3 of this Policy the guidelines and criteria for action that both the Entity and the Subjects of the Code must meet before the specific cases mentioned.

2.6. DONATIONS AND POLITICAL CONTRIBUTIONS

Donations with solidarity character shall be governed by the provisions of section 3.3 of this Policy and the Policy of the Solidarity Fund.

In any case, it is forbidden to make any type of contribution, direct or indirect, to a political party or organization and its representatives.

3. SPECIFIC STANDARDS

The Entity has classified the various types of situations envisaged into three groups in order to clarify the criteria and guidelines for action. All the constraints defined below apply to both gifts and invitations offered by Allfunds and received by Persons Covered, regardless of their rank, or by close relatives of these.

Based on this classification, there follows a definition of specific criteria for each of the aforementioned groups, as well as the relevant guidelines:

3.1. DELIVERY AND/OR RECEIPT OF GIFTS, FEES, REMUNERATIONS, INCOMES, DISCOUNTS, COURTESIES, ADVANTAGES OR BENEFITS:

In these cases there is direct delivery to third parties or receipt from third parties with whom Allfunds has a relationship, of either a tangible or intangible good, for personal enjoyment.

Generally, it is in all cases forbidden to make and/or accept any gift, fee, remuneration, income, discount, courtesy, advantage or benefit that, due to its value, frequency or other characteristics, might be understood to affect the recipient's objectivity in decision-making.

No Person Covered may deliver, request or accept any kind of payment, gift, fee, remuneration, income, advantage or benefit in relation to their professional activity at Allfunds. This ban

refers to relationships with other employees, customers, suppliers, counterparties, intermediaries or any other third party with whom there is a relationship. It is also mandatory to refuse any gift, fee, remuneration, income, courtesy, discount, benefit or advantage that, due to its value, frequency or any other characteristic, might be understood to affect the recipient's objectivity in decision-making.

Exceptionally, the circumstances described below might be acceptable provided they comply with the limitations and the employee complies with the procedures described in sections i), ii), iii)):

- a) Inexpensive advertising merchandise (i.e. biros, key rings, note books, etc.).
- b) Gifts or courtesies resulting from specific, commemorative and/or exceptional causes in accordance with social traditions and standard commercial practice (such as Christmas or wedding gifts), provided they are not in cash and are within moderate and reasonable limits³.

When a Person Covered receives or offers any of the aforementioned items, that employee must follow the following **notification and/or authorisation procedure**:

i. **When the estimated value is lower than 150€:** The Person Covered is not obliged to notify receipt or delivery of the gift or courtesy. However, the Person Covered must bear in mind that, although the delivery or receipt of this kind of gift or courtesy is permitted, they must not exceed the limits considered reasonable according to normal social standards and courtesy.

ii. **When the estimated value is higher than 150€:** Authorisation must be sought from the employee's immediate superior and from the Regulatory Compliance Unit for their receipt and acceptance through the procedure set forth in Annex I hereto. In addition, should a gift, fee, remuneration, income, advantage or benefit be granted to or received from a fund house, in any event this must be notified to the Global Head of Fund Groups for approval.

If the person receiving/offering the gift or courtesy is an employee of the Regulatory Compliance Unit, he or she must request authorisation from the General Manager or the Deputy General Manager of the Entity.

iii. When the gift, remuneration, fee, benefit or advantage is offered or received to/from **a public official, authority or body**, in all cases, regardless of the amount, this must be notified to the immediate superior and to the Regulatory Compliance department for authorisation.

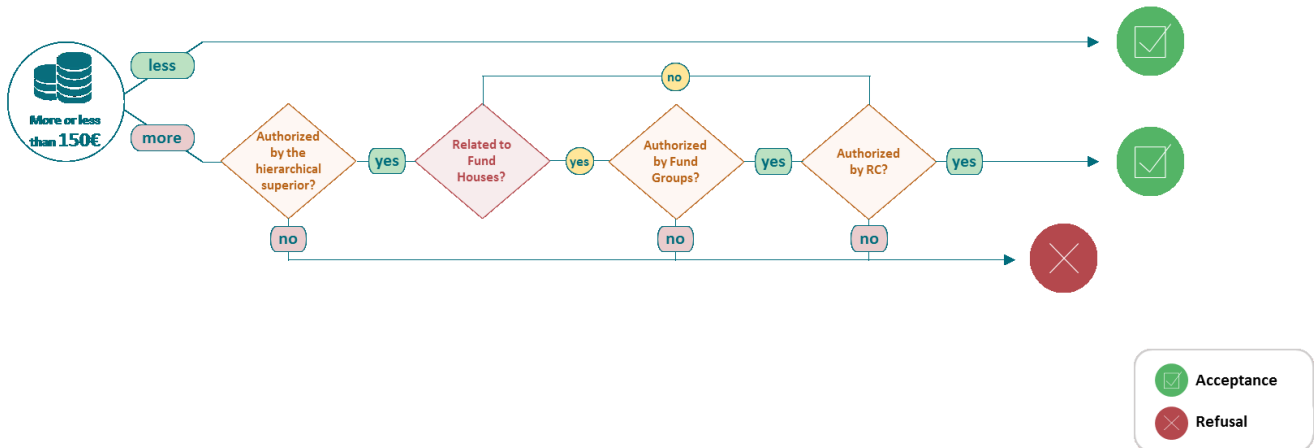
If the immediate superior, the Global Head of Fund Groups or the Regulatory Compliance Unit refuse such authorisation, the person ultimately making the decision will notify the Person Covered affected, and the latter must refrain from accepting or delivering the payment, fee,

³ It is understood that gifts whose value does not exceed 150 euros or the equivalent amount in the relevant currency, per person, are considered to be moderate and reasonable. To calculate the amount, all gifts and attentions received or delivered from/to a supplier or customer in a period of six months will be taken into account.

gift, remuneration, benefit or advantage. However, if not receiving or delivering any of the aforementioned items might imply a discourtesy in accordance with the culture of the country, the Person Covered must notify the Regulatory Compliance Unit, which will make the final decision taking into account this circumstance.



DELIVERY AND/OR RECEIPT OF GIFTS, FEES, REMUNERATION, INCOME, DISCOUNTS, COURTESIES, ADVANTAGES OR BENEFITS (ANNEX I)



3.2. ORGANISATION, DELIVERY/RECEPTION OF AN INVITATION OF/TO ANY EVENTS

In these cases there is an organization of an Allfunds event or the delivery or receipt of an invitation to/from third parties there is an invitation to/from third parties to take part in a seminar or other kind of event, which also implies the use of a tangible or intangible good for personal enjoyment.

Generally, in all cases it is forbidden to make and/or accept any invitation which, due to its value, frequency or other characteristics, may be understood to affect the recipient's objectivity in decision-making.

In the particular case of invitations to events, the Group distinguishes two different scenarios:

a) **WHEN THE INVITATION IS BUSINESS-RELATED:**

Within this casuistry, the Group distinguishes three different assumptions as detailed below.

For the calculation of all the amounts mentioned below, all the concepts included in the invitation and attentions received or delivered from/to the same third party for each invitation must be taken into account independently.

i. **It includes travel and/or accommodation:**

- **For an estimated amount less than 500€.** If the total amount of all items included in the invitation is less than 500 euros per person or the equivalent amount in the relevant currency, it only needs to be authorised by the employee's immediate superior and notified to the Regulatory Compliance department for record purposes, in accordance with the procedure described in Annex II. The Regulatory Compliance Unit will decide whether or not Allfunds pays the travel and/or accommodation of the Allfunds employee to attend the event, depending on factors such as the relationship with the third party, the importance for Allfunds of the attendance to the event in question, etc.
- In addition, if the invitation is extended to or received from a fund house, in all cases this must be notified to the Global Head of Fund Groups using the same procedure.
- If the person receiving/extending the invitation is an employee of the Regulatory Compliance department, he or she must request authorisation from the General Manager of Allfunds, or the Deputy General Manager of the Entity.
- **For an estimated amount more than 500€.** If the total amount of all items included in the invitation is more than 500 euros per person or the equivalent amount in the relevant currency, it must be authorised first by the employee's immediate superior and then by the Regulatory Compliance Unit, in accordance with the procedure described in Annex II. The Regulatory Compliance Unit will decide whether or not it is appropriate for Allfunds to pay the amount of the travel and/or accommodation on behalf of the Allfunds employee to attend the event, based on criteria such as the relationship with the third party, the importance for Allfunds of attendance to the event in question, etc.
- If the person receiving/extending the invitation is an employee of the Regulatory Compliance Unit, he or she must request authorisation from the General Manager of Allfunds, or the Deputy General Manager of the Entity.
- In addition, if the invitation is extended to or received from a fund house, in all cases this must be notified to the Global Head of Fund Groups for approval using the procedure outlined in Annex II. If the Global Head of Fund Groups approves the invitation, the procedure will be passed on to the Regulatory Compliance Unit for its approval.
- If the Global Head of Fund Groups does not approve the invitation, the file will be passed on to the Regulatory Compliance Unit for its knowledge.
- If the person receiving/extending the invitation is an employee of the Regulatory Compliance department, he or she must request authorisation from the General Manager of Allfunds, or the Deputy General Manager of the Entity.

If the immediate superior, the Global Head of Fund Groups or the Regulatory Compliance Unit refuse such authorisation, the person ultimately making the decision will notify the Person Covered, and the latter must refrain from accepting or issuing the invitation. However, if not receiving or delivering any of the aforementioned items might imply a discourtesy in

accordance with the culture of the country, the Person Covered must notify the Regulatory Compliance Unit who will make the final decision taking into account this circumstance.

ii. It does not include travel and/or accommodation (i.e. luncheons, dinners, speeches, workshops, congresses, seminars, etc.).

- **For an amount less than 150€:** If the total amount of all the concepts included in the invitation is less than 150 euros per person or its equivalent in the corresponding currency, it should only be communicated and authorized by the immediate superior, with no need to keep a written record on file.

If the person receiving/extending the invitation is an employee of the Regulatory Compliance department, he or she must request authorisation from the General Manager of Allfunds, or the Deputy General Manager of the Entity.

In addition, if the invitation is extended to or received from a fund house, in all cases this must be notified to the Global Head of Fund Groups.

- **For an amount more than 150€:** If the total amount of all the concepts included in the invitation is greater than 150 euros per person or its equivalent in the corresponding currency, it is necessary to request authorisation from the immediate superior and the Regulatory Compliance Unit, in accordance with the procedure outlined in Annex II.

If the person receiving/extending the invitation is the head of the department, or an employee of the Regulatory Compliance department, he or she must request authorisation from the General Manager of Allfunds, or the Deputy General Manager of the Entity.

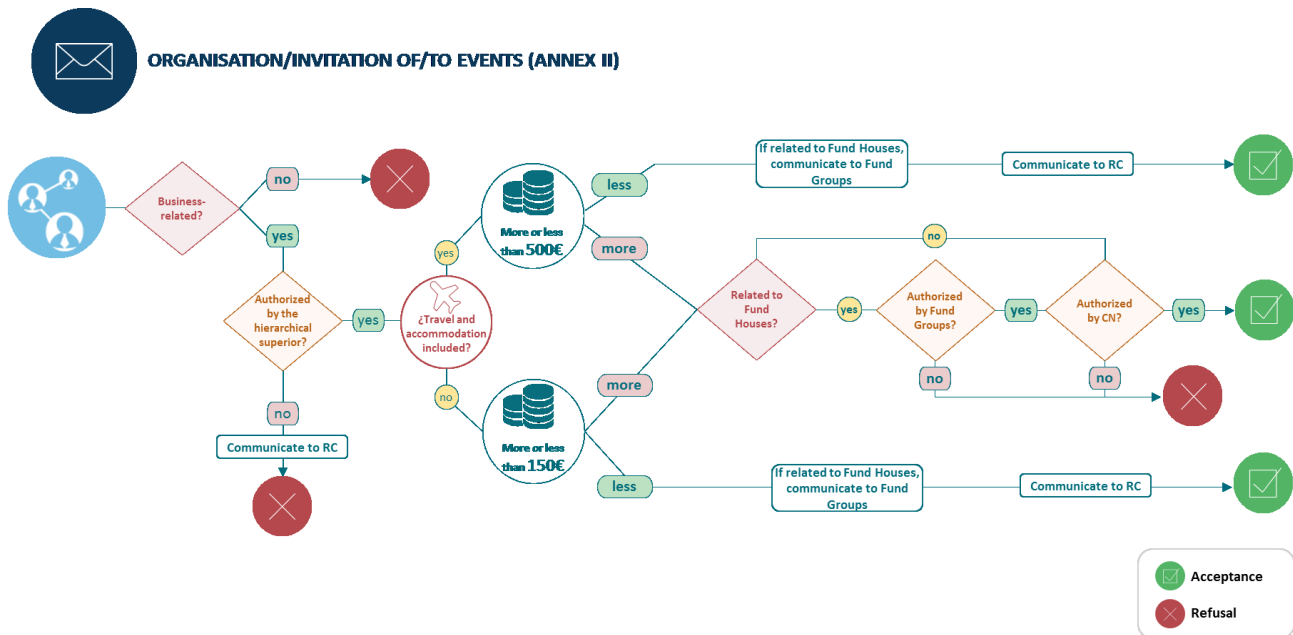
Additionally, if the invitation is extended to or received from a fund house, in all cases this must be notified to the Global Head of Fund Groups for approval.

iii. When the invitation is extended to or received from a public official, authority or body, in all cases, regardless of the amount, this must be notified to the Regulatory Compliance Unit for authorisation.

In all the cases described in section a), when the immediate superior, the Global Head of Fund Groups or the Regulatory Compliance Unit refuses such authorisation, the person ultimately making the decision will notify the employee, and the latter must refrain from accepting or issuing the invitation. In any event, the Regulatory Compliance department must be notified of the final decision for record and filing purposes. If not receiving or delivering any of the aforementioned items might imply a discourtesy in accordance with the culture of the country, the employee must notify the Regulatory Compliance department, which will take the opportune measures in connection with the decision to accept or not, which it must notify to the employee within reasonable time.

b) WHEN THE INVITATION IS NOT BUSINESS-RELATED:

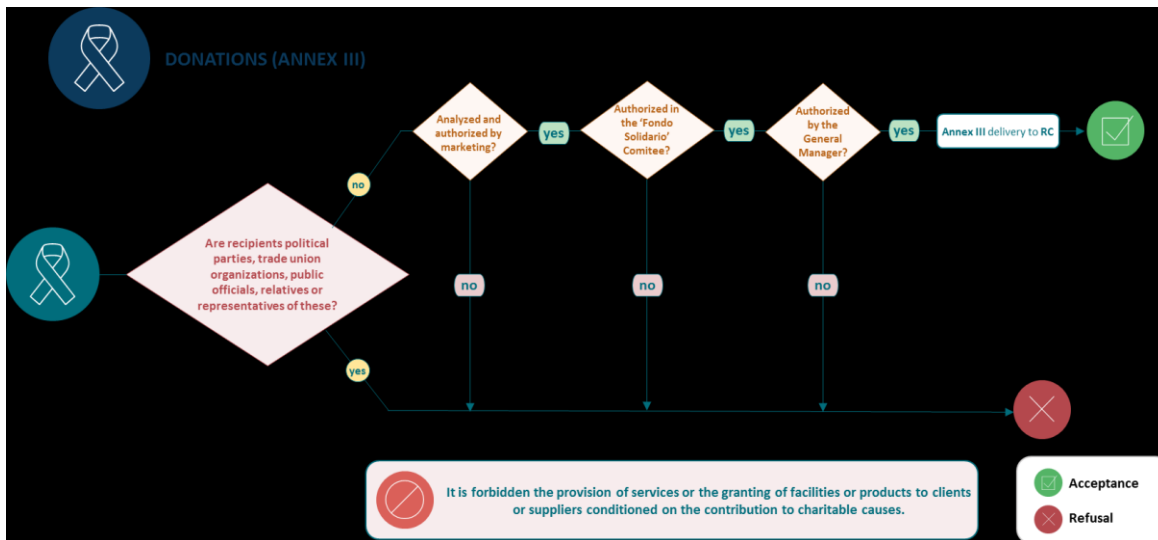
The use or enjoyment of any invitation received or issued and not business-related, regardless of its amount (i.e., personal travel, tickets to sporting or cultural events, lunches or dinners, among others). Person Covered receiving such invitations must refuse and notify the Regulatory Compliance Unit through the procedure outlined in Annex II for the record. If it is an event of particular relevance for the Group, the procedure for exceptions set forth in section 6 may be followed.



3.3. DONATIONS MADE IN THE COMPANY'S NAME

It is forbidden to provide services or grant facilities or products to customers or suppliers conditional upon their contribution to charity causes. In no case may donations be made to political parties, unions, public officials or their families, or to their representatives.

In accordance with the values of transparency and integrity, the Group only collaborates with entities that have been previously analysed by the Marketing department in accordance with the procedure "AFB Fondo Solidario Investment Policy" and have been authorised by the General Manager previous presentation of the analysis carried out by the Marketing department in the "Fondo Solidario" Committee. For its registration, any donation made and approved by the General Manager must be communicated to the Regulatory Compliance Unit through the Annex III.



4. OBLIGATION TO KNOW AND COMPLY WITH THE ANTI-BRIBERY AND GIFT AND ENTERTAINMENT POLICY

All Persons Covered are obliged to know and comply with this Policy and the General Code of Conduct, and to collaborate in facilitating its implementation in the Group, helping to create a culture of compliance.

In this sense, it corresponds to the Human Resources department with the help of the Regulatory Compliance Unit to make this Policy available to the Subjects of the Code and to organize the training for the adequate knowledge of it.

In addition to being published on the Group's intranet at the disposal of all Allfunds employees, this Code will be included in the welcome pack that every new employee of the Group will receive at the time of joining the Entity.

5. NON COMPLIANCE WITH THE ANTIBRIBERY AND GIFTS AND ENTERTAINMENT POLICY

Non-compliance with this Policy may lead to disciplinary proceedings in accordance with the applicable labour legislation at each given time, notwithstanding the administrative or criminal proceedings that, in the event, might also derive therefrom. These penalties are governed by the provisions of the General Code of Conduct, and the Disciplinary System, both published on the Group's intranet.

In no case may notifications that fail to comply with the process described in this Policy be accepted. Should a Person Covered conduct communications outside this circuit, he or she must understand that said communication has not been properly conducted and that, accordingly, it does not comply with this Policy.

All Person Covered who become aware of a breach of this Policy must notify it directly via the whistleblowing channel (canaldedenuncias@allfundsbank.com) as described in the General Code of Conduct.

It is the responsibility of each Person Covered to know and properly assess local practices.

6. REGULATORY COMPLIANCE UNIT

The Regulatory Compliance Unit is entitled to ban any action, even though it is within the permitted limits, if it considers that it might constitute bribery risk, a conflict of interest or an activity that might jeopardise the reputation of the Group.

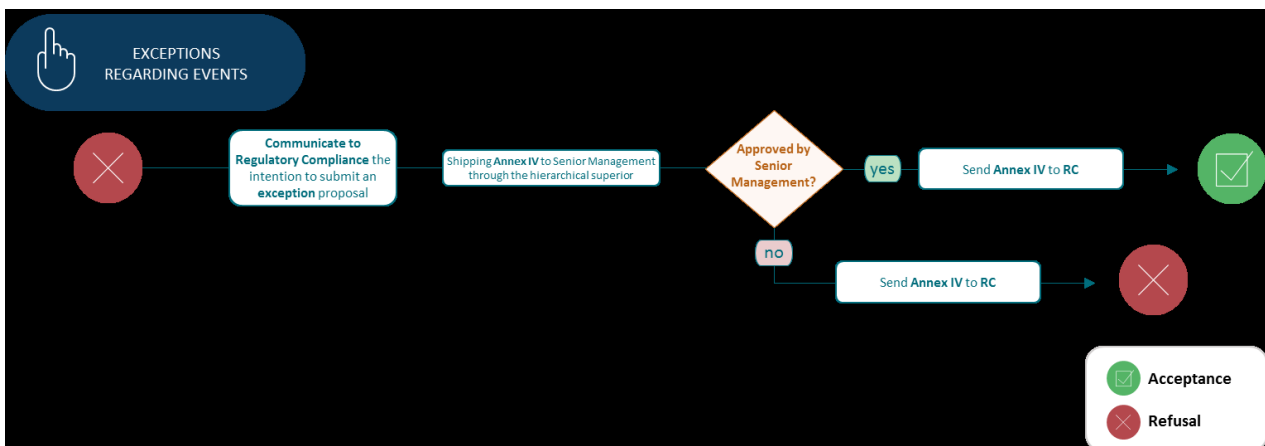
7. EXCEPTIONS

Those events considered to be of special significance for the Group must in any case follow the standard procedure described in this Policy.

When any of these events has been refused due to failure to comply with the criteria established herein, each department reserves the right to present, via its head, the proposal to the General Management, by completing Annex IV hereto, detailing, in any case, the reasons why it was decided to follow the procedure of exception. Once assessed, General Management,

together with Regulatory Compliance Unit, may decide to grant an exception if it considers that the organisation of/ or the attendance at the event is necessary for Allfunds.

In any case, after receiving the refusal in the first instance, the head of the requesting department will notify the Regulatory Compliance Unit that, having been refused permission through the normal channels, exceptional clearance is to be sought for the proposal. Once the exceptional process is completed, the head of the requesting department will notify the Regulatory Compliance department of the final decision, attaching a completed copy of Annex IV.



8. ANNEX I: COMMUNICATION OF DELIVERY AND/OR RECEIPT OF GIFTS, COMMISSIONS, REMUNERATIONS, INCOMES, DISCOUNTS, ATTENTIONS, ADVANTAGES OR BENEFITS

	DATE:	REFERENCE ⁴ :
NAME AND SURNAME(S) OF THE EMPLOYEE WHO RECEIVES OR DELIVERS ⁵		
EMPLOYEE'S DEPARTMENT		
EMPLOYEE'S POSITION		
NAME OF THE COUNTERPARTY		
NUMBER OF PEOPLE RECEIVING THE GIFT, COMMISSION, REMUNERATION... ⁶		

GIFT, BENEFIT OR ADVANTAGE DATA (RECEIVED OR DELIVERED)		
IS THE COUNTERPARTY AN OFFICIAL, AUTHORITY OR PUBLIC ORGANIZATION? ⁷		
IS IT A DELIVERY OF A GIFT, BENEFIT OR ADVANTAGE? ⁴		
IS IT A DELIVERY OF A GIFT, BENEFIT OR ADVANTAGE? ⁴		
IS THE GIFT RECEIVED GOING TO BE AUCTIONED FOR SOCIAL PURPOSES? ⁴		
PLACE OF RECEIPT OR DELIVERY OF THE GIFT, BENEFIT OR ADVANTAGE	OFFICE	
	HOME	
ESTIMATED AMOUNT OF THE GIFT, BENEFIT OR ADVANTAGE	<150 ⁸ €	
	>150 ⁹ €	
IF >150€, STATE AMOUNT AND CURRENCY PER PERSON		
DETAILED DESCRIPTION OF THE GIFT, BENEFIT OR ADVANTAGE (RECEIVED OR DELIVERED)		

Employee
(Name and signature)
Date:

Direct supervisor authorization
(Name and signature)
Date:

Regulatory Compliance
authorization
Date:

Regulatory Compliance refusal
Date:

4 To be completed by Regulatory Compliance department.

7 If the third party recipient or issuer is an official, authority or public body, regardless of the amount, it must be communicated to the Regulatory Compliance department for authorization.

6 In case of delivery by Allfunds, attach the list of people that will receive it, the entity to which they belong and their position.

7 In the affirmative case, mark with an "x".

8 It must be authorized by the hierarchical superior and communicated to the Regulatory Compliance department for its registration.

9 It must be authorized by the hierarchical superior and the Regulatory Compliance department.

9. ANNEX II: COMMUNICATION ON THE ORGANIZATION/INVITATION TO EVENTS

	DATE:	REFERENCE ¹⁰ :
NAME AND SURNAME(S) OF THE EMPLOYEE ¹¹		
EMPLOYEE'S DEPARTMENT		
EMPLOYEE'S POSITION		
NAME OF THE COUNTERPARTY		
NUMBER OF PEOPLE RECEIVING THE INVITATION ¹²		

EVENT INVITATION DATA		
IS THE COUNTERPARTY AN OFFICIAL, AUTHORITY OR PUBLIC ORGANIZATION? ^{13,14}		
IS IT AN INVITATION GIVEN TO A THIRD PARTY? ⁴		
IS IT AN INVITATION RECEIVED FROM A THIRD PARTY? ⁴		
IS THE INVITATION BUSINESS-RELATED? ^{4,15}		
DOES THE INVITATION INCLUDE TRAVEL AND/OR ACCOMMODATION EXPENSES?		
IF THE AMOUNT INCLUDES TRAVEL AND/OR ACCOMMODATION EXPENSES, HOW MUCH IS IT? ¹⁶	< 500€ ¹⁷	
	> 500€ ¹⁸	
IF THE AMOUNT DOES NOT INCLUDE TRAVEL AND/OR ACCOMMODATION EXPENSES, HOW MUCH IS IT?	< 150€	
	> 150€ ¹⁹	
IF > 500€ OR >150€, DEPENDING ON THE CASE, STATE AMOUNT AND CURRENCY PER PERSON		
DETAILED DESCRIPTION OF THE INVITATION (RECEIVED OR DELIVERED)		

Employee
(Name and signature)
Date:

Direct supervisor authorization
(Name and signature)
Date:

Regulatory Compliance
authorization
Date:

Regulatory Compliance refusal
Date:

12 To be completed by Regulatory Compliance department.

11 To be communicated to all employees receiving or giving an invitation.

12 In case of delivery by Allfunds, attach the list of people that will receive it, the entity to which they belong and their position.

13 In the affirmative case, mark with an "x".

14 If the third party recipient or issuer is an official, authority or public body, regardless of the amount, it must be communicated to the Regulatory Compliance department for authorization.

15 In case the invitation is not business-related, it should be refused and communicated to Compliance.

16 In Euros or its equivalent in the corresponding currency.

17 It must be authorized by the hierarchical superior and communicated to the Regulatory Compliance department for its registration.

18 It must be authorized by the hierarchical superior and the Regulatory Compliance department.

19 For those invitations without travel and/or accommodation only Compliance authorization is required, if the amount > 150€.

10. ANNEX III: COMMUNICATION OF A DONATION CARRIED OUT ON BEHALF OF THE COMPANY

	DATE:	REFERENCE ²⁰ :
NAME AND SURNAME(S) OF THE EMPLOYEE		
EMPLOYEE'S DEPARTMENT		
EMPLOYEE'S POSITION		
NAME OF THE COUNTERPARTY RECEIVING THE DONATION ²¹		

DONATION DATA	
DATE OF THE DONATION APPROVAL	
DONATION DESCRIPTION, AMOUNT AND CURRENCY	

Employee
(Name and signature)
Date:

General Manager authorization
Date:

²⁰ To be completed by Regulatory Compliance department.

²¹ The counterparty receiving the donation must be previously authorized by the CEO.

11. ANNEX IV: REQUEST FOR AN EXCEPTION OF EVENTS BY THE SENIOR MANAGEMENT

	DATE:	REFERENCE ²² :
NAME AND SURNAME(S) OF THE EMPLOYEE ²³		
EMPLOYEE'S DEPARTMENT		
EMPLOYEE'S POSITION		
NAME OF THE COUNTERPARTY		
NUMBER OF PEOPLE INVITED TO THE EVENT ²⁴		
REFERENCE TO ANNEX II INITIALLY REFUSED		

EVENT INVITATION DATA	
HAS IT BEEN REFUSED BECAUSE OF HAVING NO DIRECT RELATION WITH BUSINESS? ²⁵	
HAS IT BEEN REFUSED BECAUSE OF EXCEEDING THE ESTABLISHED ECONOMIC LIMITS? ⁴	
STATE INVITATION AMOUNT AND CURRENCY PER PERSON	
DETAILED DESCRIPTION OF THE EVENT	
REASONS FOR WHICH THIS EVENT SHOULD BE OBJECT OF EXCEPTION	

Direct supervisor authorization
(Name and signature)
Date:

General Management
authorization
Date:

General Management refusal
Date:

²⁴ To be completed by Regulatory Compliance department.

²³ To be communicated to all employees receiving or giving an invitation.

²⁴ In case of delivery by Allfunds, attach the list of people that will receive it, the entity to which they belong and their position.

²⁵ In the affirmative case, mark with an "x".

12. ANNEX A

Once the Anti-Bribery and Gifts and Entertainment Policy was approved by the Board of Directors of Allfunds Bank, S.A.U., Allfunds Bank International, S.A. will proceed to make the necessary adaptations in this Annex A according to the particularities of this entity and the applicable local regulations.

ANNEX A – ALLFUNDS BANK INTERNATIONAL S.A.

This version of the Anti-Bribery and Gifts and Entertainment Policy was approved by the Board of Directors of Allfunds Bank, S.A.U. on May 17th, 2018. As a consequence of that, Allfunds Bank International, S.A. has proceed to make the necessary adaptations in this Annex A according to the particularities of this entity and the applicable local regulations as stated below.

All references to the Regulatory Compliance Department in this document should be considered as reference to the Compliance Department in Allfunds Bank International S.A. (with the compliance function in the branches and/or subsidiaries) which is in coordination with Allfunds Bank, S.A.U. Regulatory Compliance Unit for the proper application of the Anti-Bribery and Gift and Entertainment Policy and also for the other regulatory compliance requirements within the Group.

The Anti-Bribery and Gifts and Entertainment Policy is also applicable to the Allfunds International Switzerland AG (AFIS), the Swiss subsidiary of AFBI which is authorised to distribute funds. As highlighted in the previous paragraphs, all the references to regulations and/or regulatory bodies in the Anti-Bribery and Gifts and Entertainment Policy should be considered as reference to the equivalent regulation and/or regulatory bodies in Switzerland for the application of this document in AFIS.

Similarly all notifications should be sent to the e-mail address Complianceafi@allfundsbankinternational.com.