



**Mundotêxtil**

**ANTI-CORRUPTION  
POLICY**

Version 1

## 1. PURPOSE AND SCOPE OF APPLICATION

This Policy aims to reinforce the commitment of Mundotêxtil - Indústrias Têxteis, S.A. in maintaining integrity and ethics standards in the conduct of its business by establishing anti-corruption guidelines.

This Policy is linked to Mundotêxtil's Code of Ethic and Business Conduct, so both regulations must be followed by the entire organization, including Employees, partners and suppliers so that everyone observes the guidelines in order to prevent and combat situations prone to acts corruption, bribery and fraud.

## 2. DEFINITIONS

The following definitions are considered for the purposes of interpreting and applying this Policy:

**Unlawful Act:** any action or omission, willful or negligent, voluntary or involuntary, that violates any mandatory legal provision.

**Employee:** any person hired by Mundotêxtil under an individual employment contract, provision of services or any other title, provisionally or temporarily, for remuneration or free of charge, on a permanent or temporary basis, or as a trainee or minor apprentice.

**Corruption:** activity that involves the abuse of power to obtain an improper personal or business advantage, which may consist of obtaining material or non-property advantages.

**Business Courtesies:** includes gifts, entertainment, transportations, travels, benefits, gifts and expense payments.

**Payment for Facilitation:** any payment intended to encourage or speed up the practice of an act, to obtain an omission, refusal or favorable treatment, even if in an attempted form, contrary or not, to the duties of the respective positions or functions.

**Anything with Value:** expression that should be interpreted broadly to include anything, monetary or not, that results in a profit. There is no minimum value and it may include favors, awarding contracts, loans, payment of expenses or debts, use of materials, transports, accommodations, insurance benefits, privileged information, promises of future employment.

**Bribery:** includes payments, offers or promises of payment, authorizations to pay or provide Anything with Value, made by Mundotêxtil, directly or indirectly, in order to obtain an advantage. On the other hand, being bribed consists of agreeing to receive or accept a financial or any other advantage, offered or promised, with the intention that, in consequence of this reception or acceptance, to be performed by Mundotêxtil.

### 3. CORRUPTION RISK AREAS

Some situations can set up evidence of corruption. The situations detected must be duly proven until it is certain that they set up corrupt behavior.

#### 3.1 Business Courtesies

Mundotêxtil pays special attention to any type of offer, gifts or other type of courtesies, direct or indirect, that aren't in accordance with local laws and its policies and procedures, to avoid the appearance of improper conduct.

#### 3.2 Representatives

The illegal acts and omissions of Mundotêxtil Representatives may expose Mundotêxtil to risk and, for this reason, Representatives are responsible for taking on Mundotêxtil's commitments regarding transparency and integrity in all its business relationships.

#### 3.3 Political Contributions

Mundotêxtil recognizes that its Employees can be active in the political process, but their participation will have to be carried out on an individual basis, in their free time, using their own resources. Any political contribution on behalf of Mundotêxtil must be approved by the Board of Directors of Mundotêxtil.

#### 3.4 Accounting and Financial Operations Records

Mundotêxtil requires that all transactions/operations are documented, approved and classified. Under no circumstances, false, imprecise or misleading documents must appear in books and records.

### 3.5 Social Responsibility Donations and Sponsorships

Community support is an integral part of Mundotêxtil, however contributions that violate the Code of Ethics and Business Conduct and this Policy can't be made. Any contribution must be for social/charitable purposes.

### 3.6 Facilitation payments

Mundotêxtil bans its Employees and Representatives from giving or authorizing, directly or indirectly, any facilitation payments.

## 4. ANTI-CORRUPTION MEASURES

At Mundotêxtil there is zero tolerance for any situation of corruption, undue receipt of advantages or payments of any benefits contrary to the Code of Ethics and Business Conduct and this Anti-Corruption Policy.

- It isn't acceptable for Employees, in the exercise of their functions, accept, request or offer business courtesies, unless permitted by law. Offers must be transparent, occasional and not consist in cash or equivalent. They must be in accordance with good social/cultural customs, they mustn't be interpreted as intended to obtain a favor or an undue advantage, appear to exert any form of pressure or influence on business relationships, or influence the decision of an entity.

- It is forbidden to accept, request and offer professional courtesies, when they involve any person or company, in the context of negotiation with Mundotêxtil, by contracts or procedures that may create any improper advantage and that cause a conflict of interest.

- Business courtesies can't be offered to Employees, holders of political positions, senior public officials, family members and Employees' friends of Mundotêxtil.

- It isn't acceptable that Mundotêxtil Employees are harmed or penalized due to the non-conclusion of business resulting from the refusal to allow or condone the forbidden conducts of this Policy.

- The nominate of a Representative requires that he/she accepts this Policy and that no payment made by Mundotêxtil is passed as a bribe.

- Any political contribution on Mundotêxtil' behalf must be approved by the Administration.
  
- Donations for social responsibility purposes and sponsorships must be carried out in a transparent way, being previously documented, approved and made only for legitimate reasons for the purpose of the donation and sponsorship, such as serving humanitarian interests in support of cultural and educational institutions and searching for brand knowledge and appreciation.
  
- It must ensure that all accounting and financial transactions are fully documented, approved and classified for the correct description of expenses that reflect their nature with respect to shareholders, investors and society in general.

## 5. ACCEPTANCE AND OFFER CRITERIA

The determination of the convenience of business courtesies and offers by Mundotêxtil must attend the requirements of occasionality, social acceptability and economically symbolic nature of the offer.

The business courtesies acceptance and offer are allowed when the following requirements comply with:

- Allowed by law;
- Transparent offers;
- Occasional and not in cash or equivalent;
- According to good social/cultural customs and shouldn't be susceptible to interpretation intended to obtain a favor or an undue advantage;
  - Business courtesies that aren't authorized, but for whatever reason can't be refused or returned.

These courtesies and offers must have legitimate commercial purposes to inform about Mundotêxtil's products, for marketing purposes with customers and potential customers, to establish relationships through the offer of small gifts in festive seasons and to celebrate the company's success with customers, suppliers and service providers.

**6. DISCLOSURE**

The Anti-Corruption Policy is disclosed to all Employees through internal and external communication channels, namely by email and company information boards.

**7. COMPLAINT**

All Employees who have knowledge or suspect situations that don't comply with the provisions of this Policy must report it to Human Resources or through the following channels provided by Mundotêxtil:

Email: *sugestões@mundotextil.pt*


Phone: 253 489 420

Address: Rua da Saudade, nº 280-400, 4815-413 Vizela, Portugal

**8. DEFAULT**

Non-compliance is considered a serious infraction, that could rise the application of disciplinary or other legally applicable measures.

The Administration,

  
~~MUNDOTEXTIL - Industrias Têxteis, SA~~  
Rua Saudade, 280 a 400  
Vizela, 14<sup>th</sup> June 2021  
4815 - 413 VIZELA