

# Quibim Anti-corruption Policy

VER: 01  
Code: POL-01-Anticorruption Policy  
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## Purpose

The values of Quibim, reflected in the “*Quibiomics*”, imply total commitment to the highest standards of integrity, excellence, respect for the law and for human rights. Thus, Quibim requires its activity to be conducted according to such principles and with the utmost respect for any applicable laws, whether national or international.

This Anti-corruption Policy (the “**Policy**”) shall govern the behavior of all managers, executives, employees and external collaborators of Quibim in the conduct of business, bearing in mind that Quibim has implemented a *zero-tolerance* policy of any practice that may be classified as corruption or the giving or receipt of bribes. The Policy will govern the interactions between Quibim and any third party.

With this Policy, Quibim aims to convey an unambiguous message of opposition to corruption and fraud in all of their manifestations, and Quibim’s desire to combat them in all of its activities, thereby contributing to the achievement of compliance with goal sixteen of the Sustainable Development Goals (SDGs) approved by the United Nations.

## Scope

This Policy shall apply to:

- a) Quibim, S.L., Quibim, Inc., Quibim, Ltd. and the other companies in the group (“**Quibim**”).
- b) Quibim's employees and managers and service providers and independent professionals acting on behalf of Quibim (the “**Quibim Professionals**”).
- c) This Policy shall also apply, to the extent relevant, to the joint ventures, temporary joint ventures (*uniones temporales de empresas*) and other equivalent associations, if Quibim assumes the management thereof.

This Policy cannot anticipate all situations or matters. It is the responsibility of all parties involved to request information and guidance when addressing new or unusual situations. In the event of doubt, the Legal Department of Quibim should be consulted before acting.

## Applicable regulations

Quibim is an international group that operates in different countries. Each country may have specific anti-corruption legislation. This means that Quibim is subject to compliance with very varied regulations (the “**Anti-corruption Regulations**”), including:

- The United Nations Convention against Corruption.
- The OECD Anti-Bribery Convention.
- The Spanish Criminal Code.
- The U.S. Foreign Corrupt Practices Act.
- The U.K. Bribery Act.

The Anti-corruption Regulations prohibit the corruption of Government Officials as well as the offering or acceptance of corruption in business between private parties.

This Policy mandates compliance with all applicable Anti-corruption Regulations in the countries where Quibim operates.

## Prohibited Conducts

Any failure to comply with Anti-corruption Regulations is a violation of this Policy and, in particular:

- a) To give, offer, promise, contract or authorize the handing over of gifts, presents or other unauthorized advantages (“**Gifts**”), whether in cash or otherwise, directly or indirectly: (i) to a Government Official, to unlawfully influence an official act or decision; (ii) to a corporate person or similar entity in which the Government Official or a related party holds managerial control or a position of influence therein, to illegally influence an official act or decision of the Government Official; (iii) to any person, to induce him/her to unlawfully influence an official act or decision; (iv) as a reward for an official act or decision. An act includes an omission to act or a delay in the act that the Government Official should perform. No actual exchange needs to occur to violate this Policy: an offer or promise is sufficient.
- b) To solicit, receive or accept any Gifts that may influence you to perform your work duties disloyally or otherwise improperly, or to offer, give or

authorize the handing over of any Gifts in order to influence another person to perform his/her work duties disloyally or otherwise improperly.

All payments, expenditures and transactions must be classified adequately pursuant to the applicable accounting regulations, without any hidden payments that conceal the true nature of any arrangement, and they must have the appropriate authorizations as set out in the Expenses and Travel Policy of Quibim in force from time to time.

## Permitted Conducts

This Policy does not prohibit Gifts or expenses that may be considered normal or appropriate within a professional business relationship maintained in good faith, provided that the following criteria are met:

- a) They comply with Anti-corruption Regulations.
- b) They are given or received (i) on behalf of Quibim and (ii) openly, not secretly.
- c) They do not include cash or cash equivalents.
- d) They do not include funding of the costs of leisure activities, travel expenses and similar of companions or guests at business meetings.
- e) They do not include gifts that are not in good taste, or which involve attendance at locations inappropriate for the furtherance of professional relationships.
- f) They are made at an appropriate time; that is, at times when relevant decisions are not being taken with regard to aspects that may have an impact on the relationship of Quibim with the third party.
- g) Their purpose is not to influence the person for whom they are intended.

The person who hands over or makes available the gift or entertainment must ask himself/herself whether it may compromise the independence, integrity and/or honesty of the recipient when adopting a corporate or business decision. In the event of doubt, the Legal Department of Quibim should be consulted.

## Receipt of Gifts by Quibim Professionals

Should any Quibim Professional receive a Gift from a customer or supplier, or in general from any third party with which Quibim has any type of commercial, corporate or business relationship or with which it may come to have such relationship, the following criteria shall be taken into account:

Pursuant to this Policy the following are strictly prohibited:

- a) To accept a Gift when it is known or suspected that its purpose is to influence a decision that the Quibim Professional must take or to reward the Quibim Professional for a decision taken previously.
- b) To request any type of Gift from a third party.
- c) To accept Gifts during periods in which relevant decisions need to be taken regarding the person who offers the Gift.
- d) Acceptance of cash or cash equivalents is prohibited in all cases.

Quibim Professionals may accept Gifts from third parties under the following circumstances:

- a) The Gift must comply with the following qualities: it is reasonable regarding the amount or frequency, it is given at an appropriate time, the reason for which it is offered is appropriate and it is not known or suspected that the third party hopes to obtain an advantage in exchange for it in the commercial or professional relationship.
- b) Acceptance of the Gift must be permitted pursuant to the local Anti-corruption Regulations in force at the time.

In any case, the person who receives the Gift must ask himself/herself whether it may compromise his/her independence, integrity and/or honesty when adopting a corporate or business decision, paying special attention during negotiation processes and after the signing of the agreement. In the event of doubt, the Legal Department of Quibim should be consulted.

## Disciplinary Measures

Breach of this Policy or of the applicable Anti-corruption Regulations may lead to the criminal liability of Quibim as well as very serious personal liabilities, including prison terms as well as large fines, legal fees and damage to the brands and reputation of Quibim.

Thus, any Quibim Professional who breaches this Policy shall face disciplinary measures. Breaches of this Policy shall be sanctioned pursuant to the applicable internal procedures, collective bargaining agreements and legal regulations. Likewise, the laws applicable in the different jurisdictions in which Quibim performs its activity shall be taken into account.

If you know or reasonably suspect that there has been a violation of this Policy, you should promptly alert your superior and the Legal Department of Quibim.

Quibim will not discriminate or retaliate against any Quibim Professional who, acting in good faith, (i) reports any violation of this Policy, (ii) provides evidence, or (iii) participates in an investigation. Furthermore, confidentiality and anonymity will be guaranteed, should the informant so require.

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