

Anticorruption Policy

velatia

True to our adoption of the tenth principle of the United Nations Global Compact to work against corruption in all its forms, including extortion and bribery, and in order to keep us steadfast in the transparency, rigour, honesty and reliability of all our actions, **Velatia** assumes the commitments defined in this policy.

These **COMMITMENTS** are:

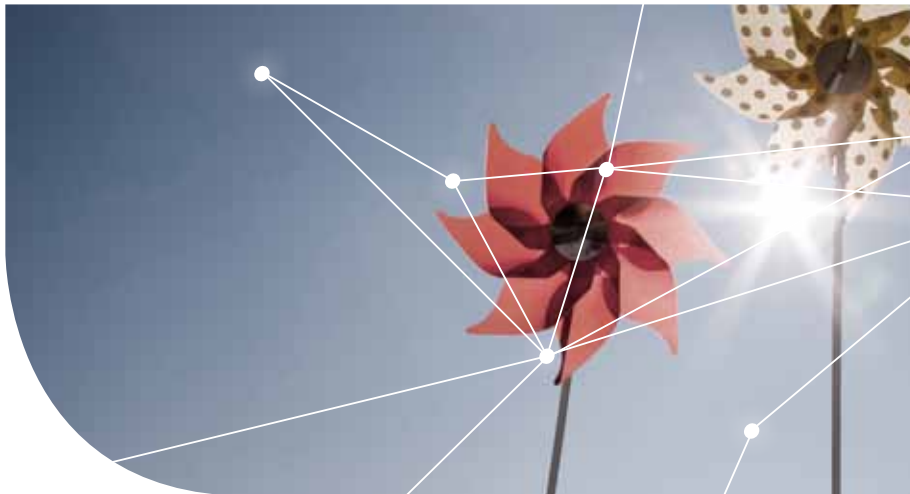
TO GUARANTEE compliance with anti-corruption and bribery laws in all countries where **Velatia** operates. This includes, but is not limited to, the U.S.A. Foreign Corrupt Practices Act of 1997, the United Kingdom Bribery Act 2010, as well as the general provisions of the United Nations Convention against Corruption.

TO ENSURE compliance by all employees, officers and directors of **Velatia**, with the measures against corruption and bribery set forth in our code of ethics, and based on those legal requirements and general provisions.

TO COMPLY with the commitments made in our social action policy, mainly ensuring that our sponsorships and donations are made to entities of rigour, honesty, great prestige and transparency in their actions and abstaining from making donations to political parties, representatives or candidates in any country of the world, or from sponsoring any event intended as political propaganda.

TO PRESENT information and perform accounting records so that they reflect the payments, expenses, transactions and disposal of assets by **Velatia** with rigour, transparency and accuracy.

TO SPREAD knowledge of this policy to all our stakeholders by making it public and available to them.



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Javier Ormazabal Echevarria
President