

1. PURPOSE

Promo Tobacco, SL within the process of continuous improvement, wants to commit effectively with a zero tolerance policy in the face of any kind of criminal behaviour or some form of corruption.

We must not only improve services to be an innovative and responsible company; In addition these services must be performed according to the highest standards of ethical requirement, avoiding any discrepancy between personal and professional interests.

Compliance is not only fulfilment of the legislation and internal company regulations; it must be our way of working and become part of our organizational culture within the long-term strategic objectives. Ethics, Compliance and Quality should be the foundations of this common project.

Currently, there are already methods to achieve it, contemplated in quality procedures such as purchases, supplier evaluation, social care policy, etc.

Finally, the Compliance Officer's compromise is to periodically revise that all the documents and procedures follow the marked standards of the ISO 37001 and UNE 19601 norms.

2. SCOPE OF APPLICATION

This crime prevention policy will be applicable to the whole developed activity of the Company; the promotion and marketing tobacco brands on behalf of the manufacturers, and the execution of specific marketing and promotion campaigns for our products. Similarly, its objective scope includes its Board of Directors and all employees. What is more, we have established a legal framework to guide the development of our activity. This is available for everyone in the company and we guarantee the commitment of the Compliance Officers to keep it up to date.

3. PRINCIPLES OF ACTION

The company is in process of implementing a Criminal Compliance and Bribery Prevention system that follows UNE 19601 and ISO 37001 standards.

The management of the company must work for the effective implementation of the Compliance system.

The Compliance Officer hands agreed principles of independence, absence of conflict of interests and enough resources to guarantee their efficiency.

Any behaviour that might be constitutive of a crime and has as a result a criminal liability to the company, including bribery, active and passive is prohibited.

Anyone from the Company must notify the management about any suspected conduct that constitutes a crime or a bribe. The company guarantees its anonymity and confidentiality.

Ledgers and records that reflect all transactions faithfully must be maintained during the legal period.

The system of criminal compliance and bribery prevention must be continuously improved and the level of risk must be reduced.

Failure to comply with this policy and the rest of the criminal compliance system will result in the penalties provided for the collective labour agreement applicable in the case of workers and the deregister as a subcontractor in their case.

This policy is available and it will be delivered to anyone who requests it.

Any question can be communicated by the mail calidad@promotobacco.com

4. CONTROL, EVALUACION AND CHECK

1. Control

It is the responsibility of the Compliance Officer to control the implementation, development and compliance with this Policy.

The Compliance officer will have the necessary faculties to guard its operation and effectiveness, controlling the adaptation of the procedures to the needs and circumstances.

2. Evaluation

The compliance and effectiveness of the established procedures will be evaluated at least once a year.

3. Check

The Compliance Policy will be reviewed periodically, transmitting to the Management those suggestions and proposals that contribute to its continuous improvement.