



# Anticorruption Policy 2025



# Our Commitment

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Anticorruption Policy

At Caralb, we are committed to conducting our business with the highest standards of integrity and responsibility to prevent any kind of public or private bribery.

This policy demonstrates our commitment to corporate responsibility, it helps promote an ethical corporate culture and increases confidence among external stakeholders on the way of doing business.

By acting for or on behalf of caralb, you must fully comply with this policy. If in doubt check with the CEO. The company does not tolerate deliberate ignorance of this policy.

Each of us is responsible for appropriate behaviour and applying careful judgment at all times.

Thanks for your cooperation.

Founder and CEO

Cesar Estevez Ferrer

For more information contact us: [info@caralb.com](mailto:info@caralb.com)

# Definitions

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1. Bribery is the offering, promising or giving, as well as the demand or acceptance of any payment or improper advantage (bribe), either directly or indirectly (such as through an intermediary), or to:
  - a. A public official.
  - b. A business partner (private bribery).
  - c. A family member of a public official or a business partner.The aim of the bribe is to obtain, retain or direct a business in an improper manner or to assure any other inadequate advantage in the way of running a business.
2. A bribe may include, but is not limited to Payments in cash or its equivalent, including kickbacks. Gifts or excessive entertainment (see article 8). Job offer (also to family members). Incentives or excessive or improper advantage. Contributions, sponsorships or charitable donations (see article 9). Political contributions (see article 10)
3. A facilitation payment is an unofficial nominal fee, paid to a public official, for ensure or expedite a routine action to which he will eventually give term. This type of rate is designed to enhance the performance of ministerial duties or any employee, which the receiver is required to perform (example: issuance of license or permit to pass goods through customs.
4. A business partner is someone with whom you have a business, is a private individual, an employee of the private sector or company.

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5. A public official may be, is not limited to:
  - Anyone with charge or who is working for, or on behalf, of a government agency at any level. (Example: A tax or government inspector).
  - Anyone working in a state enterprise or controlled by the state or public, national or international organization (Example: A college-owned university state).
  - Anyone who has a public function or deliver public service, even if that person works for an institution other than the state.
  - Anyone who is considered a public official under local law.
6. Family members including: blood relatives, spouses, partners or any other person with whom the public official or business partner has a similar relationship close.
7. Intermediaries include agents, distributors, consultants, business partners, management consultants or any other trading partner that has a commercial activity on behalf of Caralb.
8. Improper advantage may be, but is not limited to:  
Any improper influence on a decision (Example: if you achieve or maintain a business).

# Our policy and its purpose

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## Anticorruption Policy

**Politics** The policy of Caralb Maritima S.A., it's subsidiaries and it's affiliates is to fully comply with all applicable laws and regulations prohibiting bribery.

Growing up on the commitments in our Code of Conduct, the purpose of this policy is to provide our employees a guide and set global standards to prevent bribery.

**Who implements the policy** This policy applies to all employees of Caralb, as well as third parties acting on behalf of Caralb (see "Intermediaries" in Section 3.7).

- 1. No to bribery of public officials** It is forbidden to offer, pay, promise or authorize the payment of a bribe to a public official, directly or indirectly (eg .: through an intermediary or a family member of a public official) in order to obtain, retain or improperly conduct business or secure any other improper advantage in the conduct of business.
- 2. No to facilitation payments** It is forbidden to make any facilitation payments in any country, except in cases of imminent threat to health security. In this case, after being made, payment facilitation should be immediately reported to the CEO and must be registered as full and accurate books and records Caralb to show the amount, purpose and recipient of payment delivered.
- 3. No to bribery of business partners** It is forbidden to pay, offer, promise or authorize the payment of bribes to a commercial, directly or indirectly partner in order to obtain, retain or direct business in inadequate or secure any other improper advantage in the conduct of business form.

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4. **No to the acceptance of bribes** Caralb employees may not demand or accept bribes from any person directly or indirectly for the purpose of obtaining, retaining or directing business to Caralb improperly or secure any other improper advantage in the conduct of business with Caralb.
5. **Gifts and entertainment** There is a separate comprehensive policy on Gifts and Entertainment where you can find a specific guide of gifts and entertainment.
6. **Contributions, sponsorships and charitable donations** Should not be used as a substitute for bribery. They should be transparent and made only in accordance with local laws and Guides Donations and Sponsorships.
7. **Political Contributions** Should not be used as a substitute for bribery. The use of funds for political contributions must be in accordance with applicable laws and internal policies and rules and with the prior approval of the Department of Corporate Affairs appropriate.
8. **Use of intermediaries** Caralb employees should be wary of associating only with ethical intermediaries and prestige. All intermediaries must act with the highest standards of ethics and business integrity and in accordance with applicable laws, our Code of Conduct and this policy by engaging in business on behalf of Caralb.

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Should consult the Legal Department before having any relationship with an intermediary and this should be approved before hiring a broker to ensure that standards of our Code of Conduct and policy are incorporated to the contract properly.

9. **Accurate books and records** All transactions must be recorded in full, and accurate. Unregistered transactions, such as bribes, facilitation payments and kickbacks are prohibited. They are also prohibit false records, artificial or misleading to hide or represent in any way an improper transaction or the true purpose of a payment.
10. **Responsibility of our management** It is the responsibility of each manager to implement this policy in its functions, lead by example and guide their employees who report to him. Managers should not allow the payment or receipt of any bribery of those who have or should be aware.
11. **Responsibility of our employees** The responsibility for proper conduct rests with each employee. There is no substitute for personal integrity. In case of doubt, to help guide a judgment is to consider whether any payment or benefit referred could embarrass or reflect negatively to its receptor Caralb or if published on the front page of a newspaper. Any questions regarding this policy or the applicability of the laws and regulations in specific situations anti bribes or practice should be made to the CEO. You can also find more information in the Guidance Document Anti-Bribery Policy.

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**12. Report of violations** Employees are encouraged to report any instance in which suspect someone acting for or on behalf of Caralb can be committed to conduct that violates this policy. This report should be sent directly to the CEO.

All reports are taken seriously and are properly investigated. Caralb not allow retaliation against employees who report in good faith.

**13. Application/ penalties** Caralb strictly enforce this policy. Any violation will lead to appropriate disciplinary action, including dismissal, where it has been secured, and possible legal sanctions.

**14. Entry into force** This policy shall take effect from August 1, 2012 and must be implemented in all Group companies Caralb.