



# ANTI-CORRUPTION CODE

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID

## ANTI-CORRUPTION CODE

### Article 1. Purpose

The purpose of this Code is to prevent the payment of bribes or kickbacks during the normal course of the organisation's business, by establishing a set of basic principles to be respected by all members of the organisation's staff.

One of the fundamental pillars of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID's own activity is the trust that we build with our funders, partners and suppliers, something that can be ruined by the payment of bribes or kickbacks of any kind, whether to public or private entities.

At WORLD LEADERSHIP ALLIANCE CLUB DE MADRID we believe that the best way to improve the quality of our work and to contribute to the sector in which we operate is to create a healthy and competitive environment in which all entities can compete on equal terms, something that can never be achieved through the payment of bribes or kickbacks.

Regardless of the fact that the payment of bribes and kickbacks leads to sanctions, as these are actions that our legal system considers unlawful, the reality is that the negative consequences of this action cover the entire sector and affect all its participants.

### Article 2. Scope of application

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID's policies described in this Code, based on integrity and transparency, apply in the following cases:

- 1) The payment of bribes or kickbacks of any kind, whether to staff of public or private entities.

The concept of "public entities" encompasses all public employees in accordance with the provisions of Royal Legislative Decree 5/2015, of the 30<sup>th</sup> October, which approves

the consolidated text of the Basic Statute of Public Employees Law, employees of companies owned or controlled by the Administration and political representatives, and employees of the administrations of other countries or international organisations.

The concept of "private entities" would include the staff of any entity that is a normal participant in the market.

- 2) The request or acceptance of bribes or kickbacks.

We must emphasise that this policy also applies to the payment of bribes and kickbacks by entities of individuals, including suppliers, partners, or consultants, on our behalf.

### **Article 3. Lawful activities**

Activities that, based on socially accepted standards, can be considered normal or appropriate within a professional and bona fide relationship will be considered lawful.

Without limitation, activities will be deemed to be lawful if they meet the following requirements:

- They are made on behalf of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID;
- They are of public nature. It is understood that an activity is of public nature if it can be accessed by third parties and recognised as legal, as no artifices have been applied to make it secret in order to pursue an unlawful purpose;
- Respect the requirements of the applicable legal system;
- Are exclusively for the purposes of the organisation and not for the private interests of the members of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID;
- Do not seek to alter the normal conditions of equality and free competition prevailing

in the market.

#### **Article 4. Corruption**

Any business that does not respect the circumstances stipulated in Article 3 will be considered corrupt, as it implies a deterioration of the ethical values and submission to legality that govern WORLD LEADERSHIP ALLIANCE CLUB DE MADRID.

#### **Article 5. Prohibition of all types of bribes**

It is prohibited to promise, offer, or authorise payments intended to obtain or retain a source of income or other resources or to secure any other advantage for WORLD LEADERSHIP ALLIANCE CLUB DE MADRID.

Likewise, it is prohibited to request or accept payments from third-parties whose intention is to retain a source of income or other resources or to secure any other advantage for WORLD LEADERSHIP ALLIANCE CLUB DE MADRID or for a third-party entity.

#### **Article 6. Scope of the prohibition**

The prohibitions on bribery set forth in Article 3 relate to any object of value or benefit, such as money, the creation of income opportunities or other resources, favourable contracts, donations, travel, gifts, and any other similar items.

#### **Article 7. Gifts**

The free provision of any goods or services to a third-party is considered to be a gift, provided that the third party can consider the gift to be of value.

Gifts include the giving of money, whether by transfer or in cash, the payment of travel, meals, events or any material goods, the granting of exclusive discounts, the carrying out of an advertising or commercial activity, the payment of invoices or taxes, among others.

## **Article 8. Sending gifts**

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID staff is prohibited from sending any kind of gift to third parties.

This prohibition could be lifted if the following circumstances are respected:

- The gifts are lawful, in good taste, and do not consist of the giving of foreign goods or attendance at inappropriate places;
- Do not seek to influence the decision-making the gift recipient, or compromise the recipient's independence, integrity, or honesty in decision-making;
- Pursue a legitimate institutional purpose;
- They are made on behalf of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID, and not in a personal capacity;
- Do not seek to alter the normal conditions of equality and free competition prevailing in the sector;

## **Article 9. Receiving gifts**

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID staff are forbidden to receive any type of gift sent by third parties.

This prohibition could be lifted if the following circumstances are respected:

- The gifts are lawful, in good taste, and do not consist of the acceptance of foreign goods or attendance at inappropriate places;
- Do not seek, or create a perception that they seek, to influence WORLD LEADERSHIP

ALLIANCE CLUB DE MADRID's decision-making, is making any decision within the scope of its organisational mandate;

- Pursue a legitimate institutional purpose;
- They are made in favour of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID, and not in favour of any specific member of the entity's staff;
- Do not seek to alter the normal conditions of equality and free competition prevailing in the sector.

Acceptance of gifts must be made by staff with sufficient responsibility to bind WORLD LEADERSHIP ALLIANCE CLUB DE MADRID, who must be able to demonstrate compliance with all these circumstances.

#### **Article 10. Registration**

Payments made by a third party in favour of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID, as well as those made by the same in favour of third parties, must be accurately recorded in the books, records, and accounts of the entity, in order to realistically reflect the economic situation and the origin and destination of the goods and services.

#### **Article 11. Non-acceptable use of goods**

It is prohibited to record false, misleading, incomplete, inaccurate, or fictitious information in the books, records, and accounts of the entity. This prohibition extends to the tools used to keep the accounts of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID, even if the information is not definitive.

The use of goods that have not been registered in the books, registers, or accounts of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID are prohibited, regardless of the purpose of such action.

Likewise, the use of funds other than those of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID, whether personal or belonging to third parties, for any purpose whatsoever, are prohibited.

**Article 12. Relationship with the Administration (Public Administrations of Spain, other countries, and international organisations)**

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID staff members must interact with any organisation that is part of the Administration in a respectful and fully transparent manner, carrying out all actions in accordance with the legal provisions.

In addition to complying with all the requirements and prohibitions set forth in this Anti-Corruption Code, all relations with the Administration, regardless of their nature or purpose, must be approved by WORLD LEADERSHIP ALLIANCE CLUB DE MADRID's Management.

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID's Management must always justify the legality of the relations maintained with any organisation that forms part of the Administration, for which purpose the points set forth in Articles 1, 3, 6 and 7 of this Anti-Corruption Code must be respected.

**Article 13. Interaction with Administration staff**

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID staff members must interact with Administration staff in a respectful and fully transparent manner, carrying out all actions in accordance with the legal provisions.

In addition to respecting all the requirements and prohibitions set forth in this Anti-Corruption Code, all relationships involving Administration staff must be approved by WORLD LEADERSHIP ALLIANCE CLUB DE MADRID's Management.

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID's Management must always justify the legality of the interactions maintained with any person who is a member of the Administration, for



which purpose the points set forth in Articles 1, 3, 6 and 7 of this Anti-Corruption Code must be respected.

#### **Article 14. Personal relations with Administration staff**

Members of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID's Management must abstain from participating in the decision-making process of business dealings with Public Administrations in which persons with whom they maintain a relationship of trust of any kind provide services.

In those cases, in which services are rendered to the Administration, WORLD LEADERSHIP ALLIANCE CLUB DE MADRID staff members must inform their superiors of any type of relationship of trust that they maintain with Administration staff, whenever they consider that this relationship could affect the legality of the origin of the relationship, or the services rendered.

In either case, the following aspects will be assessed:

- Position of the person of trust within the Public Administration in question;
- Degree of trust with the person in the public administration in question;
- How WORLD LEADERSHIP ALLIANCE CLUB DE MADRID works for the Public Administration, focusing the analysis on the prior existence of a system of competitive tendering between several companies or other organisations.

#### **Article 15. Purpose of the relationship with the Public Administration**

It is forbidden to use WORLD LEADERSHIP ALLIANCE CLUB DE MADRID resources for political purposes, regardless of the purpose or ideology in question.



## Article 16. Duty to report

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID staff members are obliged to report to their superiors any shipment or acceptance of goods of which they are aware, and which may be considered illegal in accordance with the provisions of this Anti-Corruption Code.

To do so, please send an email to the following email address: [rhidalgo@clubmadrid.org](mailto:rhidalgo@clubmadrid.org)

## Article 17. Reporting or whistleblowing channel

In addition to what is established in article 16, communications or complaints related to situations that could be considered as corruption according to this Code should be directed through the Organization's ETHICAL CHANNEL, accessible via:

<https://clubmadrid.canales-eticos.com>

and via the CdM website at <https://clubmadrid.org/ethical-channel/>

The ETHICAL CHANNEL is a Whistleblowing Channel that complies with all legislative recommendations (guaranteeing anonymity and confidentiality of the complainant's identity, and protection against possible retaliation). It is managed by an external specialized agent, AUDIDAT 3.0 S.L., a Spanish consultancy specializing in Compliance and Data Protection. It is available to anyone who has a relationship with CdM (employees, partners, directors, suppliers, customers, associates, etc.) and aims to promote regulatory compliance, with the goal of creating a climate of trust both within and outside the Organization.

The aforementioned links guide the user to the digital platform in a simple and intuitive manner for submitting new reports or communications, as well as for tracking previously submitted reports or communications.

As previously mentioned, the ETHICAL CHANNEL is managed by a third party external to CdM in order to ensure the impartiality and objectivity required by this type of procedure. In this way, the person who manages the channel will receive the complaint and will carry out the

appropriate inquiry and investigation, for which it is vital that the informant provides as much information and evidence as possible for assessment. This agent will act in coordination with CdM's Management and the persons designated by the latter.

CdM wishes to emphasize that non-retaliation is guaranteed, as a result of which any type of reprisal against the whistleblower or informant is completely forbidden. Likewise, the presumption of innocence of the accused party is guaranteed until proven otherwise.

This ETHICAL CHANNEL involves reporting within the internal circles of the organization. Therefore, please keep in mind that, at all times, you may resort to external channels established by the competent bodies or authorities to report any act that may be considered a crime.

#### **Article 18. Indemnity guarantee**

No disciplinary or coercive measures will be taken against WORLD LEADERSHIP ALLIANCE CLUB DE MADRID staff members who refuse to make or receive payments and/or gifts that could reasonably be considered as bribes or kickbacks according to this Code, always guaranteeing that they will not suffer any negative consequences despite the fact that there may be economic losses for the entity.

#### **Article 19. Dissemination of the Code**

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID is obliged to disseminate this Anti-Corruption Code among the organisation's staff and must also inform them of any future amendments to the Code.

Dissemination will be carried out through corporate media, avoiding at all times the use of employees' personal information, and guaranteeing their right to digital disconnection.

## **Article 20. Adherence to the Code**

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID will use its best efforts to ensure that any entity or professional with whom it has a business relationship accepts this Anti-Corruption Code and adheres to it.

If the third party with which the business relationship is maintained has its own Anti-Corruption Code, WORLD LEADERSHIP ALLIANCE CLUB DE MADRID will verify that the principles on which it is based are in accordance with this Code.

## **Article 21. Resolution of doubts.**

Any staff member of WORLD LEADERSHIP ALLIANCE CLUB DE MADRID who has doubts or concerns regarding certain actions that may be considered unlawful or corrupt should immediately send an email to the following email address: [rhidalgo@clubmadrid.org](mailto:rhidalgo@clubmadrid.org).

## **Article 22. Penalty regime.**

Failure to comply with the provisions of this Anti-Corruption Code will result in the labour sanctions provided for in Royal Legislative Decree 2/2015, of 23<sup>rd</sup> October, approving the consolidated text of the Workers' Statute Law, and in the applicable Collective Bargaining Agreement, without prejudice to the fact that the proceedings may result in the imposition of criminal sanctions by the Courts and Tribunals in accordance with the provisions of Organic Law 10/1995, of the 23<sup>rd</sup> November, of the Criminal Code.

## **Article 23. Review**

This Code will be reviewed in the event of substantial regulatory, social, or organisational changes and will not become obsolete.

This Anti-Corruption Code will be reviewed and updated, if necessary, on a biennial basis.