



# **ANTI-CORRUPTION PROTOCOL**

**ENUSA Industrias Avanzadas, S. A., S. M. E.**

**Approved by the Board of Directors on 26th September 2017**

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## 1. INTRODUCTION

Compliance with the law, integrity and objectivity in business operations and ethical conduct in national and international markets are some of the fundamental principles and values that govern the actions of ENUSA, to which it is committed at the highest level.

These principles and the general guidelines of conduct that ensure their compliance are compiled, together with the rest of the values and principles that also inspire the company's activity, in the ENUSA's Code of Conduct.

Compliance with these values and principles is totally incompatible with any conduct constituting corruption, whether in the public or private sector. This is particularly true given the nature of ENUSA's activities and its status as a public company. To this end, ENUSA maintains its firm and unwavering commitment to the fight against corruption in any form.

This "zero tolerance" policy towards corruption requires the establishment and enforcement of a series of specific rules and controls for the prevention of situations and behaviours that could lead to the commission of public and private corruption crimes, both in Spain and in the other countries where ENUSA operates.

The implementation of these specific anti-corruption rules and controls is particularly necessary at ENUSA given that it operates in a highly regulated industry and with a high-profile intervention by the public Administration, meaning that crimes related to corruption are a specifically high risk area in ENUSA's activity. In addition, the risks involved in international corruption are also present in ENUSA's activity, as highlighted by the fact that over the last few years development initiatives have increased in emerging international markets, some of which represent a high corruption risk, according to the *Corruption Perceptions Index* by *Transparency International*.

The purpose of this Protocol is to establish the necessary rules, guidelines, and controls for the prevention of corruption in ENUSA, completing and developing the provisions set out in the Code of Conduct, as well as in the Organisation, Management and Control Model for Crime Prevention at ENUSA (hereinafter, the 'Model'). This is without prejudice to the adoption of additional controls derived from more demanding local regulations or obligations in this area.

## 2. SCOPE OF APPLICATION.

### 2.1. Objective scope

The ENUSA's Anti-corruption Protocol, (hereinafter, the 'Protocol'), is circumscribed to Company activity and to its professionals in the exercising of their duties in the name of the Company.

### 2.2. Subjective scope

This Protocol is mandatory for Administration Board members, managers and employees (permanent and temporary). Although indirectly, this Anti-Corruption Protocol is also addressed to the persons and entities that are related to ENUSA as suppliers, clients, advisors, intermediaries, etc. These third parties should be aware of ENUSA's anti-corruption regulations as set out in this Protocol as well as in the ENUSA's Code of Conduct and Model of Organization, Management and Control for the Prevention of Crimes.

### 2.3. Territorial scope

This Protocol applies to any territory or jurisdiction, both national and international, in which ENUSA carries out its activity, without the need of any subsidiary, branch office or permanent establishment.

## 3. TERMS AND DEFINITIONS

Before ENUSA's internal rules related to the prevention of corruption are set forth, it is important to be clear about the main issues concerning this subject, without prejudice or impairment to its legal definition. Corruption, understood in its widest sense, includes the following crimes:

- Specific to the public sector: Bribery, corruption of foreign officials, influence peddling and embezzlement.
- Corruption in business matters or corruption between private parties.
- Illegal financing of political parties.
- **Gift** is anything deemed to be of economic value: money, presents, goods or assets of any kind, service provision, jobs for family members, contracts, trips, invitations to shows, etc.
- **Bribery** is deemed the act of corrupting or being corrupted in exchange for gifts in order to obtain something.

- **Bribery crime** is classified as active (committed by a private party) and passive (committed by an authority or public official).
- Active bribery is committed by a private party who corrupts or attempts to corrupt a public official or authority with gifts, presents, offers, or promises. It also includes the assumption that the private party would hand over the gift or retribution at the request of the public official.
- Passive bribery is carried out by an official who requests or receives the bribery.
- The purpose of the bribery or gift may be that the public official carries out an illegal act (or stops doing what they are obliged to do). But it is also a crime when the purpose of the bribe or gift is a legal act. Likewise, there is a crime when the bribe or gift takes place after the official's act and as a reward for that act (legal or illegal).
- There may even be a bribery offence when the gift or gratuity is offered or given to the public official in return for nothing, simply in consideration of his or her office or function. In this case, it is usually understood that gifts that are simply a courtesy or in accordance with social customs are not criminal. However, the Penal Code establishes no limit: it does not state what courtesy or social use gifts are (indeed, it does not even mention them), and neither does it set an economic threshold from which a gift is considered illicit.
- In the case of bribery, both the official who allows himself to be corrupted and the private individual who corrupts commit the crime. The crime is equally serious in both cases.
- There is a crime of bribery whether the gift is offered or given directly to the official or whether it is offered or given to a relative of the official, a person indicated by the official or a person or entity interposed (for example, a company formed by relatives, friends or front men of the official). Equally, in corruption crimes between private parties the benefit or advantage may be offered or given through the person interposed.
- Likewise, the criminal responsibility for the corruptive action does not disappear if it involves a third party hired by a company (an advisor, consultant, intermediary, etc.) who offers or delivers the gift. The fact that the act of corruption is carried out directly by the third party hired by the company does not constitute a barrier or firewall. In such cases, both the company itself and the managers or employees involved in the project may incur criminal liability, even if they did not make any direct handouts to the public official or

even if they did not have any dealings with the public official. For this reason, special care should be taken in the selection of intermediaries, advisers, etc., to be engaged in this type of transaction.

- For the purposes of the offence of bribery, the concept of public official is broader than the concept we usually use in ordinary language. Public officials are considered not only officials in public Administrations, but also Ministers and Councillors in autonomous communities, Members of Parliament and Senators, public office holders, personnel working in public Administrations and, in general, anyone engaged in public office, as well as anyone holding public office in the European Union, in any other foreign country, or in an international public organisation. Employees and managers of public enterprises are also considered to be civil servants for the purposes of these offences.
- As indicated, the corruption of foreign officials is also a crime. If it involves those who exercise public functions in the European Union, in any other foreign country, or in a public international organization, it is equated with the crime of bribery of Spanish officials. Therefore, if, for instance, an employee or manager of a Spanish company offers or gives a bribe or gift to a foreign public official (or accepts the official's request) in exchange for the official favouring the Spanish company in the award of a contract, the employee of the Spanish company commits a crime that is prosecutable in Spain, regardless of whether or not it is prosecuted in that foreign country. The same applies if the bribe is in favour of an employee or manager of a foreign public company.
- In these crimes involving corruption it is not acceptable to claim that “everybody does it” or that “if you don’t pay for it you will never earn a contract”. In crimes involving corruption it is irrelevant that the initiative is instigated by the public official or the private party. Furthermore, any act of corruption involving extortion of the public official is also a crime.
- The Criminal Code imposes prison sentences on persons, both public officials and private individuals, who carry out acts of corruption. The same is true for the laws of most countries. Today, corruption in international transactions is considered particularly serious and is rigorously prosecuted in many countries. Of special importance in this point is the law in the United States regarding corrupt practices aboard (the *Foreign Corrupt Practices Act*). In international corruption, the laws of many Western countries apply to acts carried out abroad (this is the case with the Spanish Criminal Code, or the American law cited above). This means that an act of corruption committed

abroad (a bribe in exchange for a public contract, for example) can be prosecuted and punished in several countries.

- Acts of corruption can result in the imposition of severe penalties or sanctions on the companies involved. In many countries (including Spain) the company itself can be convicted of a bribery or corruption offence if any of its employees or managers offers or gives a bribe, or accepts a request to give it. Penalties or sanctions on companies can consist of very high fines as well as disqualification from bidding on public contracts with the government. Such disqualifications are also imposed by international agencies that promote or finance infrastructure projects in different countries (e.g. the World Bank). This means that an act of corruption, in addition to the possibility of imprisoning the employee or manager involved, can have very serious consequences for the company where he or she works, potentially endangering its survival.
- Corruption offences cannot be committed by simple negligence. They are what is known in Spanish criminal law as intentional crimes. However, when it comes to determining whether wilful intent is involved (as opposed to simple negligence, which is not a criminal offence in this area), the courts in most countries (including Spain) apply a doctrine called “deliberate ignorance”, which means that if someone has sufficient reason to believe that there is going to be a corrupt act and, despite this, prefers to look the other way and not do anything to prevent it, then there may be criminal responsibility, as if they had clearly known that this corrupt act was going to take place. In other words, if a person deliberately places himself in a position of ignorance, of not wanting to know, despite having good reason to suspect what is happening, he or she may end up incurring criminal responsibility for an intentional crime.
- The **crime of corruption between private parties** consists of promising, offering or conceding benefits or advantages, either directly or through third parties, to administrators, managers, employees or collaborators of other trading companies or organisations of any kind, with the aim of gaining an advantage in contract, acquisition, or sales processes. This conduct is criminal whether the benefit or advantage is offered or made on one's own initiative or in response to a request from the director, administrator, collaborator, or employee of the other company. Obviously, the offence is committed equally by the employee or manager who accepts or requests the benefit or advantage in exchange for favouring the contracting of goods or services.
- Therefore, corruption does not cease to exist when the bribe or commission is offered or given to an employee or manager of a private company. It is a

different type of corruption, but equally criminal. Commissions to company employees or managers in exchange for giving a supplier an advantage are not only immoral; they currently constitute a crime.

- The **crime of influence peddling** consists of influencing a public official or authority by taking advantage of a personal relationship with them or of another public official or authority, with the aim of obtaining a beneficial decision for themselves or for a third party. It is equally considered an offence to solicit or accept any form of remuneration or reward in exchange for exercising such undue influence on an official.
- The **crime of embezzlement** exists when an authority or public official with the faculty to administer public heritage goes too far in their management and causes prejudice to the administered heritage.
- The **crime of illegal financing of political parties** exists when, either directly or indirectly through an interposed natural or legal person, any donations or contributions are received by or facilitated to a political party, federation, coalition or group of electors, or foundations or their dependent organisations, that contravenes provisions set out in Organic Law 8/2007, of 4th July, on the financing of political parties, as well as participating in any structures or organisations, whatever their nature, the aim of which is to finance political parties, federations, coalitions or groups of electors, in breach of the law.

## **4. ENUSA'S POLICY RULES FOR THE PREVENTION OF CORRUPTION**

### **4.1. Realisation and offering of rewards, benefits, or gifts**

4.1.1 It is forbidden to offer or to hand over to a public official, public employee or administrators, managers, employees or collaborators from other public trading companies or public organisations of any kind (or accept their request), directly or through relatives of interposed persons, any kind of reward, benefit, or gift, with the limits, conditions and amounts established in section 4.1.6 below.

4.1.2 Likewise, it is forbidden to offer or to deliver (or accept its request) to a manager, administrator or employee of any private company or organisation, or any third party who hires the services or has any business relationship with ENUSA, any rewards, benefits, or gifts that, breaching their obligations in the acquisitions or sale of goods or in the hiring of services, favour ENUSA

over other companies, with the limits, conditions and amounts established in section 4.1.6 below.

4.1.3 In any case, any rewards, benefits, or gifts made under the following conditions are forbidden:

- (i) when they condition, explicitly or implicitly, a decision being taken in favour of ENUSA or of a third party, independently of the legality or illegality of said decision:
- (ii) when they constitute directly or indirectly a reward for a previously adopted decision in favour of ENUSA or a third party;
- (iii) when they constitute donations or contributions intended for a political party, federation, coalition, or group of electors that contravene the provisions set out in Organic Law 8/2007, of 4th July, on financing political parties,

4.1.4 Rewards, benefits or gifts include anything of economic value: money, presents, goods or assets of any time, service provisions, jobs for family members, contracts, trips, invitations to shows, etc.

4.1.5 It is forbidden to engage in so called “facilitation payments”, that is, the delivery of small amounts of money to public officials in order to speed up certain routine administrative procedures. This prohibition shall be respected even in the case of some countries in which ENUSA operates where this facilitation payments may be socially acceptable or commonplace.

4.1.6 The general prohibition of engaging in gifts or invitations is subject to the following exceptions:

- Promotional materials whose value is deemed minimal or insignificant (diaries, calendars, pens, notebooks, keyrings, cups, etc.)
- Gifts whose value does not exceed €100 per person, provided they are occasional (once a year at the most) and in accordance with social use and courtesy.
- Invitations to lunches/evening meals of an institutional, professional, or promotional nature, whose value does not exceed €100 per person and provided they are not carried out on more than two occasions per month.

4.1.7 Any other premise not included in the previous point shall be communicated by means of the form in Appendix II and shall be subject to the prior written authorisation of the Surveillance Board.

- 4.1.8 The Surveillance Board shall keep a record of gifts and invitations carried out by administrators, managers, and employees of ENUSA that they are aware of. This record shall contain:
- (i) identification of the administrator, manager or employee who delivers the gift;
  - (ii) identification of the person receiving the gift;
  - (iii) description of the gift and its value or, if this is unknown, its estimated value;
  - (iv) reason for which the gift has been given.

#### **4.2. Receipt of gifts, rewards, or benefits**

- 4.2.1 Employees, managers and administrators are forbidden from requesting or receiving for themselves any kind of reward, benefit or gift from suppliers, clients, intermediaries, agents, advisors or any other people or organisations who have any business relationship with ENUSA.
- 4.2.2 When it is a gift made or offered by a third party, the recipient shall politely reject it explaining that they are doing so in compliance with the rules established in the Code of Conduct and in this Anti-corruption Protocol.
- 4.2.3 In exceptional cases in which gifts are accepted respecting the amount and limits established in section 4.1.6, it shall be accepted in the name of the company, who shall be the sole owner.
- 4.2.4 The administrators, managers and employees shall communicate to the Surveillance Board, by means of the form in Appendix II, the gifts they have received or have been offered and, where appropriate, have been turned down or accepted, unless they are promotional materials whose value is minimal or insignificant (diaries, calendars, pens, notebooks, keyrings, cups, etc).
- 4.2.5 Invitations to lunches/evening meals of an institutional, professional, or promotional nature can be accepted, provided they adhere to the amount and the limits established in section 4.1.6. Otherwise, it shall be mandatory to request prior authorisation to the Surveillance Board by means of the form in Appendix II.
- 4.2.6 In the case of the value of the gift or invitation being unknown and on the understanding it may be close to the maximum amount established in section

4.1.6., the Surveillance Board shall be consulted, who shall establish an estimated value.

4.2.7 The Surveillance Board shall keep a record of the gifts and invitations received by ENUSA administrators, managers, and employees of which it is aware. The content of this record shall adhere to provisions set out in section 4.1.8.

### **4.3. Donations, sponsorships, and other non-profit contributions**

4.3.1 ENUSA may only make donations to or sponsor foundations, associations, non-government non-profit organisations with a recognised track record, as well as public organisations or public entities that are able to accredit the realisation of the social action that is the subject of the contribution.

4.3.2 In the case of donations, sponsorship, and other contributions whose aim is to finance a programme or a specific action, the benefitting party shall accredit the execution of the programme or action.

4.3.3 The making of donations to political parties and political organisations, as well as signing sponsorship agreements with organisations of this nature, is forbidden.

4.3.4 All donations, sponsorship, and other non-profit contributions made by ENUSA shall be communicated to the Surveillance Board, who shall authorise those that constitute the payment of an annual amount equal to or superior to €5,000.

4.3.5 The Surveillance Board shall create and keep a record of donations, sponsorship, and sponsorship agreements that ENUSA enters into with the indication of the benefitting party, the purpose of the contribution, the specific action financed as well as the amount contributed.

### **4.4. Professional conferences, congresses, conventions, seminars, and similar events**

4.4.1 Due to their nature of legitimate service provision, fees made to a speaker at a conference, convention or seminar organised or sponsored by ENUSA shall not be considered a gift.

4.4.2 The department/area of ENUSA that organises a professional conference, convention, seminar or similar event or invites third parties, shall communicate to the Surveillance Board, by means of the form in Appendix III, details of expenses incurred by the company, which in all cases shall respond

to social uses and courtesy. These expenses may correspond to speaker, accommodation, transport, food, and social character activity expenses, etc.

- 4.4.3 In cases in which the total amount of these expenses exceeds €500 per person, the event shall require the prior authorisation of the Surveillance Board, by means of the form in Appendix III.
- 4.4.4 The Surveillance Board shall keep a record of payments for these expenses, indicating the identity of the attendee or speaker and a description of the event. The Surveillance Board shall also keep documentation related to expenses paid out in these cases (for example, hotel, plane, train tickets, restaurant bills, etc.).
- 4.4.5 Third party rewards or expenses paid to ENUSA employees for their participation in events of this kind shall also not be considered as gifts. In any case, employees shall inform the Surveillance Board by means of the form in Appendix III and, in cases in which expenses incurred by a third party exceed €500 per person, the participation in the event shall be previously authorised by the Surveillance Board.

#### **4.5. Influence peddling**

- 4.5.1. In compliance with provisions set out in ENUSA's Organisation, Management and Control Model for Crime Prevention, it is forbidden to exert influence over a public official.
- (i) with the exercise of faculties of their position or any other situation deriving from a prior personal relationship (through family, friendship, mutual business, etc.) or hierarchy with this specific official or another official shall prevail; and
  - (ii) with the purpose of obtaining a beneficial decision in the interests of ENUSA.
- 4.5.2 It is forbidden to request to any third party, in their own or in ENUSA's name, any fee, payment or reward of any kind or amount in exchange for unduly influencing a public official in the terms described in point 4.5.1.

#### **4.6. Conflict of interest**

- 4.6.1 As established in ENUSA Group's Code of Conduct, a conflict of interest arises when an employee's personal interests interfere with their professional judgement or in their job performance. Personal interests are considered to be:

- Their own interests.
- Family interests (including partners and people in an analogous relationship).
- Interests of people with whom a manifestly friendly or hostile relationship is being maintained.
- Interests of people with whom a pending lawsuit is being maintained.
- Any other interest that might affect objectivity in the exercise of the professional activity or that might be harmful to the interests of ENUSA.

4.6.2 In the case of a situation of conflict of interest arising, be it real or potential, the affected party shall act in accordance with the provisions set out in the Code of Conduct and, in addition, they shall communicate the situation to the Surveillance Board by means of the form in Appendix IV.

4.6.3 Likewise, any person who detects a possible situation of conflict of interest on the part of an employee, manager, or administrator at ENUSA, shall communicate this situation to the Surveillance Board by means of the form in Appendix IV.

4.6.4 In the case of the conflict of interest being related to a bidding procedure, the Surveillance Board shall make it known immediately to the corresponding contracting body.

#### **4.7. Knowledge of the Anti-corruption Protocol on the part of third parties**

4.7.1 As it is a public company, the adjudication of contracts by ENUSA shall be based on principles of advertising, concurrence, transparency, confidentiality, equality, and non-discrimination in accordance with the provisions set out under current law and with internal ENUSA rules in the area of contracting.

4.7.2 In all new contracts or renewals of existing contracts that are signed with third parties (suppliers, clients, business partners, advisors, intermediaries, etc.) the compliance clause defined in Appendix I shall be included as an annex or as a contract clause in its own right.

4.7.3 As a due diligence measure, the Compliance area may propose a strengthening of said clause if the existence of circumstances that increase the risk of contracting is perceived.

## **5. TRAINING AND DISSEMINATION**

This Anti-Corruption Protocol is included among the compulsory training subjects in the Annual Training Programme.

Likewise, in addition to such training actions, the following channels shall be used in any case to disseminate this Protocol:

- (i) the general Welcome Plan, which is made available to all new company employees;
- (ii) the Intranet, which shall contain a specific section on the Anti-Corruption Protocol;
- (iii) the ENUSA website.

## **6. UNDERSTANDING AND RESOLUTION OF DOUBTS**

For any doubts regarding the interpretation of this Protocol, contact the following email: [consultacumplimiento@enusa.es](mailto:consultacumplimiento@enusa.es)

No justification of the breach of this Protocol is acceptable if claiming ignorance or lack of understanding.

## **7. REPORTING CHANNEL**

Directors, managers, and employees who become aware of any fact that may constitute a breach of this Protocol are obliged to report it as soon as possible to the Supervisory Authority, using the Reporting Channel provided for in the Crime Prevention Model and the Code of Conduct.

## **8. AUDIT CONTROLS AND IMPOSITION OF PENALTIES**

ENUSA conducts audits and supervisions on activities and controls that affect the safety, quality, environment or performance of its products and the safety and quality of its industrial and economic-financial activities.

The audits and supervisions are structured through the annual programme of internal audits of the quality management system and the annual internal audit programme of the SEPI group.

The Audit Programme must cover issues relating to the application, in addition to the Code of Conduct and the Model, of the rules provided for in this Anti-Corruption Protocol.

In the event that, due to these audits being carried out, communications being presented through the Reporting Channel, any supervisory activity in the Compliance area or any other source, it becomes apparent that any of the rules contained in this Anti-Corruption Protocol have been breached, corresponding disciplinary measures shall be enforced in accordance with the provisions set out in the Crime Prevention Model and in the Code of Conduct, notwithstanding the duty of reporting said breaches to the penal jurisdiction.

## **9. APPROVAL, ENTRY IN FORCE AND REVIEW OF THIS PROTOCOL**

The Board of Directors of ENUSA has approved this Anti-Corruption Protocol at its meeting on 26 September 2017, whereupon it has entered into force with binding effect for all its addressees.

Notwithstanding the foregoing, this Protocol shall be the subject of periodical review, and where appropriate, updating. Likewise, it shall be modified provided any improvements are deemed possible and, in any case, when the existence of a risk of corruption which not previously been identified is determined.

In this respect, the Annual Report on the application of the Model to be issued by the Supervisory Authority will have to assess whether any element of the Anti-Corruption Protocol can be improved.

## APPENDIX I

### **Compliance clause for contracts signed with third parties.**

ENUSA is firmly committed to complying with regulations related both to its activity and to the general legal dispositions and penal rules, while especially not tolerating, in any case, breaches in terms of corruption.

In compliance with the aforementioned commitment, the integrity and objectivity in business performance, as well as ethical performance in national and international markets, they are fundamental principles and values that govern ENUSA's performance, and to which it is committed at the highest level. To this end, it has approved an Organisation, Management and Control Model for Crime Prevention, together with an Anti-Corruption Protocol and Code of Conduct, that summarise the set of rules and controls that are apt for the prevention of situations and conducts that may give rise to breaches in the area governed by these rules.

The aforementioned documents are at the disposal of all suppliers and users of ENUSA's website ([www.enusa.es](http://www.enusa.es)), which the signee of the contract states they are aware of, committing to cooperate in good faith with ENUSA against all possible breaches detected to such effect during the validity of this contract.

### **The following paragraph shall be added in contracts with suppliers, business partners, advisors, or intermediaries:**

Likewise, \_\_\_\_\_ (third party) declares that their actions in this contract shall be governed at all times by principles of good contractual faith and conveniently subject to Law, in such a way that at no time shall they either participate or collaborate in the commission of any conduct that might be considered a penal breach in the legal system. The exercise on the part of \_\_\_\_\_ (third party) of any conduct that may be construed as illicit and constitute penal responsibility, may constitute a contractual breach and, therefore, cause this contract to be terminated.

## APPENDIX II

### Gift and invitation form

Send to [pmh@enusa.es](mailto:pmh@enusa.es)

**Name and Surname(s):**

**Organisation/area:**

**What would you like to do?**

- To communicate** that I have **turned down** a gift or an invitation.
- To communicate** that I have **received** a gift or an invitation.
- To communicate** that I **have given out** a gift or an invitation.

**Date in which the gift or invitation has been turned down, received, or given out:**

**Recipient or receiver (person or company):**

**Real or estimated value:**

**Description of gift or invitation:**

**Reason for gift or invitation:**

**Observations:**

**Date and signature:**

### APPENDIX III

#### Professional events form

Send to [pmh@enusa.es](mailto:pmh@enusa.es)

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Organised by ENUSA

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Name of organiser:

Organisation/area:

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Organised by third parties

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Organising company

What would you like to do?

- To communicate** payments, invitations to professional meetings, congresses, conventions, seminars.
- To request** (amount superior to 500€ per person).

Event description:

Event date:

Speaker/attendee:

Payment and/or expenses:

Date and signature:

## APPENDIX IV

### Conflict of interests form

Send to [pmh@enusa.es](mailto:pmh@enusa.es)

**Name and surname(s) of declarant:**

**Organisation/area:**

**Name and surname(s) of the person engaged in conflict:**

**Organisation/area:**

**Possible conflict situation:**

**Observations:**

**Date and signature:**

## **Corporate Address:** Compliance Area

**Edificio ENUSA**  
Santiago Rusiñol 12, pl. baja  
28040 Madrid  
Tel: 913474200