

ANTI-CORRUPTION POLICY

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1. INTRODUCTION

The Limited Liability Company KATAPULT SPORTS AND ENTERTAINMENT, S.L. has elaborated the current policy with the object to determine what is its stance, executives, workers and clients, when confronted to illegal business, and particularly when confronted to the different models of corruption.

Currently, bribe payments and gifts are a crime in our Criminal Code and can carry strict penalties for the company, not only to the juridical entity, but also the executives and employees can be object of an array of disciplinary measures.

The stance of KATAPULT SPORTS AND ENTERTAINMENT, S.L. is of zero tolerance in everything related with corruption, not accepting any kind of offer, payment, authorization, request or acceptance of bribe payments and gifts.

The fundamental values of the company reside in honesty and seriousness, therefore the base of the success is founded in the careful reputation when establishing commercial relationships in the areas of publicity, advertising and sports & gaming marketing.

The profit coming from a business obtained by wrongful means are completely contrary to our policies and are repudiated due to its only negative value for the damage it can cause to our goals.

It is requested to read carefully the present Policy and respect rigorously the principles and procedures explained in this document.

2. OBJECTIVES

Our objective is to reiterate the commitment of KATAPULT SPORTS AND ENTERTAINMENT, S.L. about the strict compliance to the regulations of prevention and fight against corruption, developing the principles established in the Ethical Code and Conduct, extending its compliance to the workers, executives, clients and business partners that so accept them.

Besides rejecting any type of inappropriate conduct, this pretends to prevent corruption, carrying out all our activities in accordance with the legislation in force in all the areas and in every country in which it operates.

To proceed with this, it is necessary to acknowledge that fall outside the ethic of the company any conduct that pretends to influence the will or objectivity of people external to KATAPULT SPORTS AND ENTERTAINMENT, S.L. to obtain any benefit or advantage by the use of non-ethical practices or contrary to the applicable law:

Give, promise or offer, directly or indirectly, valuable goods to any juridical entity or physical person, with the purpose to gain illicit advantages for the company.

Not allow any kind of payment to facilitate.

Not finance nor show support or assistance of any kind, directly or indirectly, to any political party, its representatives and candidates.

Not use donations to mask illicit payments.

Not request nor receive illicitly, directly or indirectly, commissions, payments or benefits from third parties that are related to the investment, divestment, financing or expense operations taking place within the company.

Pay special attention to those cases in which there are signs of lack of integrity from the people or entities with whom the company is making business, with the object to ensure that KATAPULT SPORTS AND ENTERTAINMENT, S.L. establishes commercial relations only with people and entities qualified and with a proper reputation.

Reflect faithfully and adequately all actions, operations and transactions of the company in its Books and registers.

Promote the internal education in terms of prevention and fight against corruption.

In relation to the acceptance of gifts, it is not allowed its request or acceptance when the objective is that the person receiving such gifts, violating his/her obligations, favours, directly or indirectly, the person or entity conceding such gifts in the contracting of goods and services.

Only gifts will be accepted in the cases that are accepted by social procedures, complying with the established criteria that explain that the goods must not be of extraordinary value or exceed its traditional objective to congratulate.

3. SCOPE OF APPLICATION

The current policy is applicable to the company KATAPULT SPORTS AND ENTERTAINMENT, S.L., its partners, managers and employees, who have the obligation to know it and fulfil it.

Likewise, KATAPULT SPORTS AND ENTERTAINMENT, S.L. will foster that those companies with which it may establish commercial relations and its suppliers operate under similar behavioural patterns and values to the ones established in this Policy.

4. PROCEEDINGS

If employees may have proof, doubts or suspicion in respect of any form of corruption, they must communicate it immediately to his/her immediate boss or through the e-mail compliance@katapult.es created as report channel.

Both the employees of the company and any third party, can also share their doubts or concerns, guaranteeing the anonymity and the inexistence of retaliations to the person that communicates in good faith truthful facts that may constitute a breach of this Policy.

The employees and partners that break these provisions will be held by the appropriate disciplinary consequences, as well as other possible actions or legal penalties that can be applied.