



Hanseatic Global
Terminals



BEST PRACTICE **GUIDE**

For RECEIVING AND GIVING
Gifts, Invitations and Hospitality

Introduction

This document provides guidelines for giving and receiving gifts, invitations and hospitality as part of Hanseatic Global Terminals Compliance Program or Crime Prevention Model for Corporate Criminal Liability; and to complement the company's policy in its Code of Ethics. Hanseatic Global Terminals operations play a strategic role in the economic development of the countries where they are located.

Therefore, they are continuously engaged with diverse public and private-sector stakeholders in the towns where they operates, including suppliers, customers, government entities and others, while always upholding best practices for receiving gifts, invitations and hospitality in accordance with current laws in each country and the highest ethical standards for achieving business objectives.

The company has developed this best practice guide to publicize its practices and assist employees and executives who, because of their jobs, are in a position to receive or give gifts, invitations or hospitality, which must meet integrity standards and strictly comply with the Compliance Program and the Code of Ethics.

Scope

The behavior guidelines in this document are applicable to Hanseatic Global Terminals and all subsidiaries, and associates are also encouraged to apply them. In addition, regardless of the regulations applicable in each country where we operate, this best practice guide will set forth the minimum required desired practices for giving and receiving gifts, invitations and hospitality to/from customers, suppliers, public officials and important public positions and politically exposed persons (PEPs).

Concept

From this point forward, we will define gifts, invitations and hospitality as anything of value presented to the recipient, whether monetary or in-kind or represented by products, transportation, travel, invitations or any other type of present, token or hospitality that can be interpreted as falling outside commercial practices or commonly accepted courtesy, and in accordance with current laws in the context of best international practices for preventing bribery, corruption and cross-border subornation.



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Giving and/or receiving gifts, invitations and hospitality

Gifts, invitations, and hospitality may be offered and/or received on various occasions, primarily during activities with business objectives, and may lead to misinterpretation by both the recipient and the giver. Therefore, the following best practices should be considered:

For giving gifts:

- They must be of moderate value.
- They must be offered only as a courtesy.
- They must be directed to all customers/suppliers that meet a certain condition (contract, sales level, etc.)
- They must be sent with a greeting (card/note) explaining the intention behind the gift (courtesy, with no consideration in exchange).
- They must be given on behalf of the company, not in your own name.
- Preferably, the gift should contain the company's logo (e.g., Hanseatic Global Terminals).
- Do not give gifts to customers/suppliers with whom you are negotiating a contract, bid, agreement or similar.
- In the context of industry-related activities, Hanseatic Global Terminals will not offer or give economic or other benefits to a public official or third party for them to perform some act within their jurisdiction or refrain from performing any of their obligations, in favor of the company.

For receiving gifts:

- The permitted referential value for receiving gifts is a maximum of 2 UF (USD 70).
- Do not receive gifts that fall outside industry practice or commonly accepted courtesy.
- Do not receive gifts from customers/suppliers with whom you are negotiating a contract, bid, agreement, or similar.
- If you receive a gift and, after analyzing it, consider it inappropriate to "receive" it, you must return it and send a thank you email or note specifying the reasons for returning it (internal company policies).
- If, in the context of industry-related activities, you receive gifts, hospitality, or invitations to events or other public or protocol-related activities from Government Entities, Public Officials, or State-Owned Companies, they must meet, without exception, the policies and procedures that govern interactions with Public Officials.



Duty to report giving or receiving of gifts, invitations and hospitality

Any gift, invitation, or hospitality that is given or received must be reported as follows:

- Always report the gift, invitation or hospitality received, notifying the company's designated focal point and sending an email to compliance.latam@hgt.com, indicating at least the sender of the gift. If the sender is a supplier, customer, or other similar, attach a photograph of the gift received.
- Always report the gift, invitation, or hospitality given by email to compliance.latam@hgt.com, with the following information attached:
 - List of people the gift is being given to, indicating whether they are customers, suppliers or others.
 - The unit value of each gift given.
 - Photograph of the gift
 - Copy of the Purchase Order and Purchase Invoice.
 - If Petty Cash, Expense Funds or a Corporate Credit Card was used for the purchase, indicate so and attach a copy of the receipt, invoice or proof of purchase.
 - Copy of the greeting card/note sent with the gift.

Since many companies have instituted best compliance practices with varying degrees of restrictions, your gift may be returned. In that case, the person in charge at each company must report the return by email: compliance.latam@hgt.com and record it in their logbook. Employees and executives may direct any questions to their direct supervisor or the Hanseatic Global Terminals Compliance Officer.



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