

RAGHSA

Documento	01 Política	Nombre	Gifts, Sponsorships & Donations Policy	
Sistema	01 Gobierno Corporativo	Sub-Sistema	01 Compliance	País 01. Corporativo
Código	01-01-103			
Fecha Emisión	Fecha Vigencia	Preparado por	Aprobado por	Nº Versión
04/07/2025	04/07/2025	DN		1

I. OBJECTIVE

The purpose of this Gifts, Sponsorships, Donations and Contributions Policy (the “Policy”) is to establish the guidelines for: (i) granting donations and charitable contributions in favor of third parties; (ii) receiving and providing gifts, donations, and similar items offered by third parties to RAGHSA employees; and (iii) granting sponsorships for different events and educational, sports, and cultural entities, among others.

II. SCOPE

This Policy applies to RAGHSA, its subsidiaries, affiliates, and/or companies under its control, its employees, and contracted third parties (hereinafter, the “Company”).

III. GENERAL

DEFINITIONS

Government Official(s): Any government authority, officer, official, employee, or representative (whether elected or appointed) of a national, state, or local government office or entity, agency, or division (including, but not limited to, any government-owned or government-controlled company), or any person acting in an official capacity on behalf of a government office or entity, agency, or division; any officer or employee of a public international organization or political party; any candidate for public office; and any individual considered a government official under local law. For clarity, “Government Officials” includes employees of national or state oil companies, or any other entity in which the State has a publicly known economic interest..

Object or Offer of Value: Money or any object or offer of value to the recipient, such as gifts, presents, services, travel expenses, donations (whether or not for charitable purposes), or political contributions.

Charitable Organization: A non-profit organization created for the purpose of improving the health, safety, culture, community development, or education of a community.

Third Party: Any party other than a Charitable Organization, which, in very exceptional and highly qualified cases, may receive donations, provided such donations relate to the same purposes defined for a Charitable Organization.

IV. POLICY

Donations and Contributions

The following guidelines apply to donations/charitable contributions:

Conditions

The Company may grant a donation/contribution to a Charitable Organization/Third Party only if all of the following conditions are met:

- The donation is made transparently, with a receipt (or equivalent document) obtained once the donation is made;
- The Charitable Organization/Third Party is in compliance with local law;
- The donation is made directly to the Charitable Organization/Third Party (or to its bank) within the country in which the community is located;

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- The donation is made to a Charitable Organization/Third Party located near the Company's operations, unless expressly approved exceptions apply; and
- The donation is not made at the request, suggestion, or instruction of a Government Official.

Review and Approval

All donations/contributions must first be reviewed and validated by the Compliance Manager (or, in their absence, the delegated function) before being submitted for approval.

If validated, the individuals authorized to grant prior written approval are as follows:

Amount	Approvers
Up to USD 10.000	General Manager
USD 10.000 – USD 100.000	General Manager + Legal Director
Above USD 100.000	CEO

Payment Method

The Company must grant donations/contributions directly, without intermediaries. The employee making the donation on behalf of the Company must always obtain a receipt (or equivalent document) from the recipient and must first consult with the Tax Department to assess its fiscal impact under applicable tax laws.

Valuation

To determine the approval requirements, donations made in currencies other than U.S. dollars must be converted into U.S. dollars at the prevailing exchange rate at the time of the transaction. Donations made "in kind" (i.e., goods purchased by or belonging to the Company) must be valued at fair market value in U.S. dollars to determine the applicable approval conditions.

B. SPONSORSHIPS

The following guidelines apply to sponsorships:

Conditions

The Company may grant a sponsorship only if all of the following conditions are met:

- The sponsorship is made transparently;
- The Third Party is in compliance with local law;
- The sponsorship is granted directly to the Third Party within the country in which the community is located; and
- The sponsorship is not made at the request, suggestion, or instruction of a Government Official.

Review and Approval

All sponsorship requests must first be reviewed and validated by the Compliance Manager (or, in their absence, the delegated function) before being submitted for approval.

If validated, the individuals authorized to grant prior written approval are as follows:

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Amount	Approvers
Up to USD 10.000	General Manager
USD 10.000 – USD 100.000	General Manager + Legal Director
Above USD 100.000	CEO

C. GIFTS

In the course of business, it is common for an individual or a company to receive or provide gifts. The following limits and prohibited situations apply:

- Receiving gifts, payments, or similar items from Government Officials is strictly prohibited.
- Company employees may not give/receive gifts, payments, or similar items to/from Government Officials, except for courtesy items (corporate merchandising – non-significant value).
- Company employees may not give/receive gifts, payments, or similar items from Third Parties exceeding a nominal value of USD 100.
- No employee shall permit any influence that could interfere with the best interests of the Company or harm its reputation.
- Any employee offered or receiving a payment or gift exceeding the limits set out in points (b) and © must reject it or return it to the sender, explaining that the Company's Policy prohibits such gifts. If returning the gift is not possible, the employee must notify the Compliance Manager (or, in their absence, the delegated function), who will determine how to proceed.

V. COMPLIANCE

Splitting or segmenting the amounts of donations, contributions, sponsorships, or gifts to circumvent the limits and/or approval requirements established in this Policy is strictly prohibited. A series of donations and/or gifts reasonably related shall be considered a single transaction for the purpose of determining the approval levels required by this Policy. All employees must follow the guidelines of this Policy and ensure compliance by Third Parties and/or staff. Any breach of this Policy must be immediately reported following the guidelines set forth in the Company's Code of Ethics.

VI. EXCEPTIONS

All exceptions to this Policy must be approved prior to execution by the Legal Director (or, in their absence, the delegated function).

V. RESPONSIBILITY

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The administration, updating, and dissemination of this Policy is the responsibility of the Compliance Manager.

REFERENCES
Code of Ethics