

	<b>Anti-bribery and anti-corruption policy</b>	Document no.	HVG-24-007
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## 1 About the policy

It is Hendrik Veder Group's policy to conduct business in a honest way. Hendrik Veder Group is committed to comply with a applicable anti-bribery and anti-corruption laws and regulations of the jurisdictions in which we operate.

### *To whom does the policy apply?*

Our anti-bribery and anti-corruption policy applies to everyone working at or with Hendrik Veder Group. This includes employees, subsidiaries, subcontractors, suppliers, joint ventures controlled by Hendrik Veder Group and other parties with whom we work, wherever located.

## 2 What are bribery and corruption

**Bribery** is the offering, giving, promising or accepting or receiving of anything of value with the intention of inducing, rewarding or acting or refraining from act of a person.

**Corruption** can be defined as the abuse of entrusted power for private gain, typically involving bribery.

## 3 Our anti-bribery and anti-corruption policy

Hendrik Veder Group is committed to comply with applicable anti-bribery and anti-corruption laws and prohibits bribery and corruption, given or received, whether directly or indirectly. We therefore apply the following principles.

### *Anti-bribery and anti-corruption*

You cannot offer, promise, give or receive any financial (or other) advantage to any domestic, foreign or international public official or business partner to improperly influence a decision or outcome affecting our business.

### *Facilitation Payments*

Hendrik Veder group opposes facilitation payments. If you encounter a demand for a facilitation payment, or you think you are likely to do so, you must report the situation to your immediate manager so the a response may be formulated.

### *Gifts, hospitality, and entertainment*

Gifts, hospitality and entertainment may take place if this is or and cannot be seen as an improper inducement and is of an selected level.

### *Sponsorship and donations*

Sponsorship and donations are prohibited if they are intended to influence, or could reasonably be perceived to influence, a tender or other decision in favour of Hendrik Veder group. You must ensure that the payments is permitted by applicable laws and regulations. The HR Department is responsible for ensuring that our charitable contributions are appropriate and proportionate.

### *Cash payments*

Cah payments should be avoid, unless there is a justifiable reason to pay in cash.

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#### 4 Business Partners

We value our business relations and treat them professionally, fairly and with integrity. We select business relations whose values and committed to ethical business conduct match our own.

##### *Suppliers*

The main principles of this policy have also been incorporated in the '*Code of Conduct for Supply Chain Partners*'; which forms part of the contractual relationship between Hendrik Veder Group and the supplier.

##### *Agents*

Some countries require us to engage an agent, and a agent can also provide local support during the execution of a project. We try to mitigate the risks associated with working with agents through a robust *Agent Policy*.

#### 5 Non-compliance

Hendrik Veder Group will take a no tolerance approach towards wilful breach of this policy. Bribery is a criminal offence and corrupt acts expose Hendrik Veder Group and its employees to the risk of prosecutions, fines and imprisonment, as well as endanger the reputation of Hendrik Veder Group. Breaches of the policy are unacceptable and may result in disciplinary action, dismissal, legal sanctions and/or reporting to authorities.

#### 6 Raising Concerns

If you are in any doubt as regards the applicability of this policy, or if you wish to raise a concerns regarding a potential instance of bribery or corruption, pleas report to your management. You may also report to concern to the internal or external '*Trusted Person*' to whom your concerns may be communicated.

Hendrik Veder Group guarantees that reporter who has reported concerns properly and in good faith will be protected against negative consequences.

Rotterdam, 25 July 2024



E. Vennik  
CEO – Hendrik Veder group B.V.