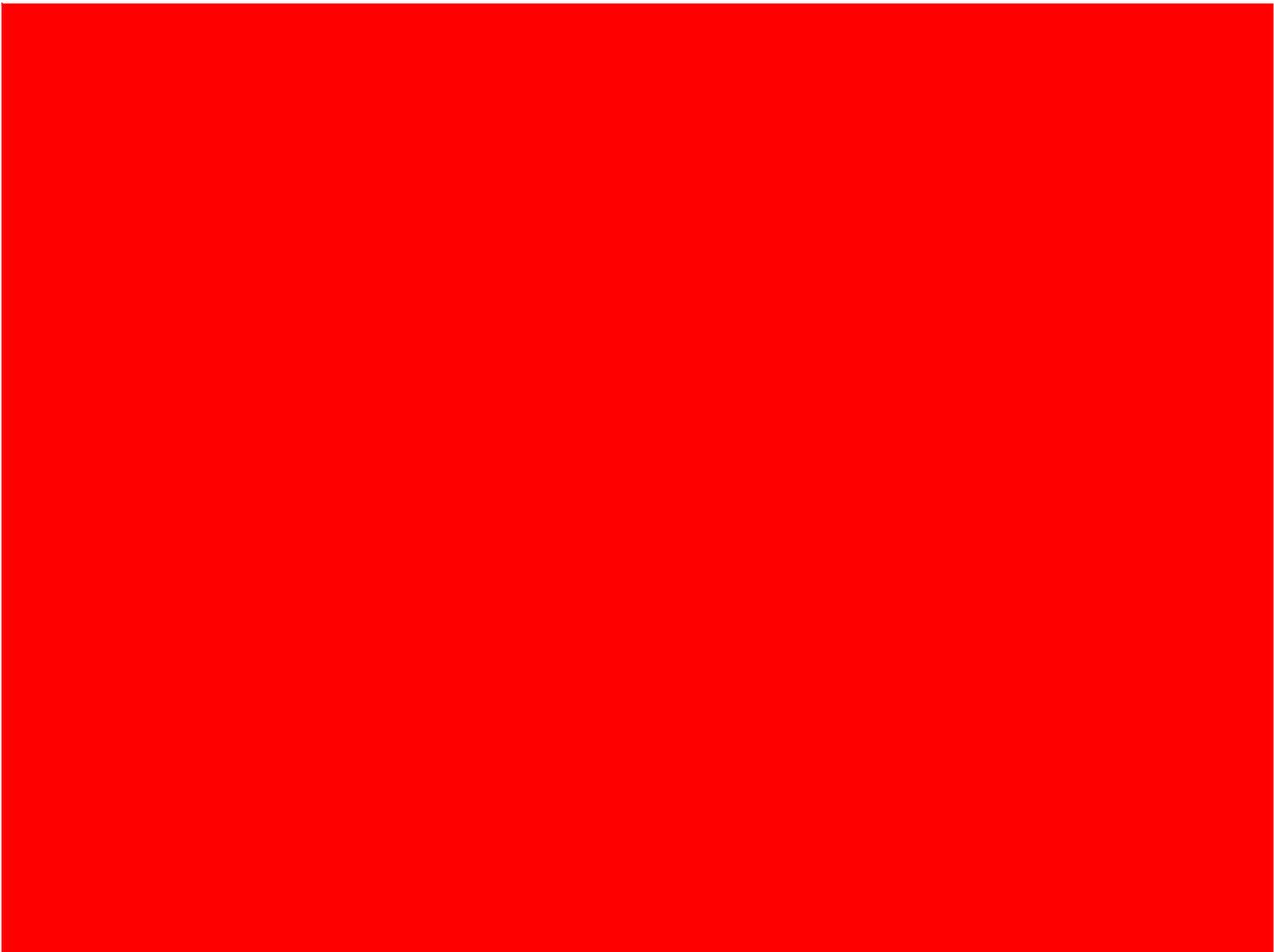




Anti-Bribery and Anti-Corruption Policy





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1. Purpose

The purpose of this policy is to outline Aprojects' ("the Company") commitment to conducting business ethically and to prohibit bribery and corruption in all its forms. This policy is applicable to all regions and branches of the Company and to all employees and representatives acting on or on behalf of the Company.

1.1 What is corruption/bribery?

The following can be interpreted as bribery or corruption:

- Bribery: the offering, giving, receiving, or soliciting of anything of value to influence the action of an official or other person in a position of trust.
- Corruption : dishonest or fraudulent conduct, including bribery, extortion, embezzlement, and abuse of power.

2. Policy Statement

Anti-Bribery and Anti-Corruption Policy is a crucial component of our organization's governance framework. Aprojects is committed to act with integrity, transparency, and in full compliance with all applicable anti-bribery and anti-corruption laws.

We will not tolerate any form of bribery or corruption, whether committed by employees, agents, contractors, subcontractors, or any other associated parties. With this policy Aprojects makes sure that the principles and guidelines will be complied by everyone with whom it does business.

3. Scope

This policy applies to all employees, contractors, subcontractors, agents, management, and any other parties associated with Aprojects. It covers all activities and operations, both within and outside the organization.

Aprojects strictly prohibits:

- Offering, giving, receiving, or soliciting bribes or corrupt payments;
- Engaging in any corrupt practices, such as extortion, embezzlement, or money laundering;
- Providing or accepting gifts, entertainment, or hospitality that may influence or be perceived to influence business decisions.

4. Compliance with Laws and Regulations

All individuals associated with Aprojects must comply with applicable local and international anti-bribery and anti-corruption laws, including but not limited to the:



- Council Framework Decision 2003/568/JHA of 22 July 2003 on combating corruption in the private sector;
- Council Act of 26 May 1997 drawing up, on the basis of Article K.3 (2) (c) of the Treaty on European Union, the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union

5. Gifts and Hospitality

Gifts and hospitality may only be offered or accepted if they are modest, legal, and infrequent. Employees must avoid any gifts, hospitality, or expenses that could be perceived as an attempt to influence business decisions improperly.

6. Political Contributions

Any political contributions made on behalf of Aprojects must be transparent, legal, and in compliance with applicable laws. Political contributions must be approved in advance by the appropriate authority within the company.

7. Facilitation Payments

Facilitation payments refer to small bribes or payments made to expedite governmental services. These payments most of the times are made to public officials or government employees to speed up their regular duties, such as processing licenses or official documents.

The big difference between a bribe and a facilitation payment is that a bribe influences officials to act improperly while a facilitation payment ensures faster and more efficient services. However, facilitation payments still include offering money which contributes to a culture of corruption.

Aprojects explicitly forbids facilitation payments. However sometimes there is no way around because of the imminent threat of personal health, safety or liberty that exists. In that case we are not longer speaking about facilitation payments but about extortion payments which should be immediately documented and passed on to the police.

8. Third-Party Due Diligence

Before entering into any business relationship with a third party, Aprojects will conduct appropriate due diligence to assess the risk of bribery and corruption associated with that party.

9. Reporting

Employees are encouraged to report any suspected or actual violations of this policy promptly.



9.1 How to raise a concern if you witness a bribe or corruption

In case you think that a decision, handling or practice is in breach of this Policy, it is then in your right and even your obligation to report this matter. It can be brought before your supervisor, manager or a Compliance Officer who will help you to create a report.

9.2 What if you are the victim

If it happens that you are asked to make a bribe or you are being offered a bribe by a third party, or you even suspect that something like that will happen in the future, then it is important to act as soon as possible. In all the aforementioned cases please contact your supervisor, manager or a Compliance Officer immediately.

9.3 Safety

Aprojects emphasizes protection of its employees therefore it is also a possibility to stay anonymous if you wish and if permitted by local laws. Then the reports will be treated as confidentially and as reasonably possible.

9.4 Consequences of Violations

Violations are time-consuming, expensive and disturbing for the Company. Therefore the violations in respect to this policy are not tolerated and may result in disciplinary action, up to and including termination of employment or engagement with Aprojects. Additionally, legal actions may also be taken which may include heavy fines or even imprisonment, depending on the severity of the violation.

10. Review and Update

This policy will be regularly reviewed and updated to ensure its effectiveness and compliance with changing laws and regulations. The latest version can always be found on our website.

Aprojects is committed to maintaining the highest standards of business ethics and conduct. All employees are responsible for familiarizing themselves with and abiding by this policy.