

Policy on Anti-Bribery

1. General

Ordina believes that business decisions must be based on independence and objectivity. We therefore condemn any kind of bribery or attempt at bribery, in both the public and private sectors. This means that you must never be involved in any form of or attempt at bribery.

Bribery is when you offer or give something of value with the intention of persuading the recipient to grant an unfair advantage – or if you reward the recipient for this kind of unfair advantage. The impression of bribery alone can result in the integrity of Ordina and its staff being called into question. Amongst other things, this can result in serious damage to Ordina's reputation.

Ordina aims to conduct its business in a principled manner at all times, and to prevent financial and reputational damage. We do this by making it clear that Ordina will have nothing to do with bribery. There is not a single business transaction for which it is worth putting your and our good reputation on the line.

Finally, remember that bribery is a criminal offence that can have far-reaching consequences for all those involved.

This policy will help you to decide how to behave in situations that may arise and how to prevent bribery, or the impression of bribery, from arising.

2. Basic rules for the private and public sector

- Never offer gifts, payments or anything else of value that is intended to persuade the recipient to grant an unfair advantage – or to reward the recipient for granting an unfair advantage. In addition, any gift or payment, or anything else that could convey the impression that bribery is being attempted, is forbidden.

Reciprocally, never accept gifts, payments or anything else of value that is intended to bribe you (or that could create the impression that this is the case).

- By 'anything of value' we mean everything that is of value to the recipient. This could be money, a present, a discount, or the use of Ordina's company resources; but also, for example, a service or favour, or the promise of a job or internship.

Example: A key client's regular buyer rings you to ask if you could arrange an internship place at Ordina for his son. The buyer implies that in exchange for the internship place, Ordina will have a 'better chance of success' in future negotiations.

Question: May you arrange the internship place for the buyer's son?

Answer: Offering an internship place represents something of value for the buyer. As a result, his decision-making in the negotiation process is no longer unbiased. Therefore, you may not accede to his request. It makes no difference whether Ordina wins the contract or not. What matters is the intention to influence the decision-making process. Whether or not this works makes no difference.

- Think about how a situation might appear to other people. Even if your intentions are honourable, the impression of bribery can still be created. Avoid situations like this.

Example: You have a commercial position at Ordina. An old school friend of yours is now the Councillor for Civil Affairs at the Municipality of Vrielande. The municipality puts out a call for tender for a new ICT system for the population register. During the selection process, you twice take your councillor friend out for a meal. You do not discuss the new ICT system.

Question: Is this a good idea?

Answer: Even if it is not your intention to influence the Municipality of Vrielande's decision (and you do not discuss the new IT system with your councillor friend), that impression could easily be conveyed to outsiders. You must avoid creating any impression of bribery, and therefore you must not go out for meals with your councillor friend during this period.

3. Public sector – additional points to note

Ordina is doing business with civil servants and public authorities in two different ways:

- Public authorities/civil servants that carry out a governmental task with regard to Ordina (e.g. to obtain a permit for Ordina, or to carry out an inspection);
- Public authorities/civil servants that have a client relationship with Ordina. Regardless of whether you enjoy a client relationship or a governmental relationship with civil servants, you always need to be acutely aware that your actions may convey the impression of bribery. Remember that, in principle, civil servants are not permitted to accept anything of value, precisely to avoid bribery and creating the impression of bribery. The government has also taken additional steps to protect the integrity of civil servants: bribing civil servants attracts a far more severe punishment than in the private sector. For its part, Ordina wants to make every effort to protect the integrity of civil servants. Therefore, when doing business with civil servants, always be aware of their special status.

4. Any questions or doubts?

Do you have any questions or doubts as to how to behave in a particular situation? If so, always contact your manager or the Compliance Officer.

In case of non-compliance with this policy Ordina may take disciplinary measures.

This Policy on Anti-Bribery was compiled in conjunction with the:

- Policy on 'Gifts and Corporate Entertainment'