

POLICY ON FRAUD

1. General

Fraud can take many forms, but it always involves an intentional act of wrongdoing or negligence, or creating a false image that misleads people inside or outside Ordina. Someone who commits fraud does so for personal gain or for the benefit of Ordina or a third party, such as a family member or an Ordina client. Regardless of the intended party, fraud is prohibited under all circumstances.

In addition to covering the issue of fraud in the strictest sense of the word, this directive also covers the accurate presentation of facts, both in our internal and external communications. Ordina wants to be a reliable business partner, which means pursuing a policy of transparency and honesty.

If you suspect fraud at Ordina, you are required to contact your supervisor or the compliance officer immediately.

This Policy on Fraud can help you to determine how to act in these situations.

2. Basic rules

- Do not falsify documents. Do not copy or forge signatures and do not use a digital signature without the express consent of the owner. Include the accurate date of signature on all documents.
- Provide a truthful account of the facts and information in your communication with Ordina and external parties. This applies to all documents, such as resumes intended for clients and expense reports for Ordina. In all cases, the contents must be accurate.

Example: A client is looking to hire someone with a higher professional education degree for a secondment assignment. You think you've found the perfect candidate. The only problem is that after studying for five years, the person did not obtain a degree.

Question: Do you include a higher professional education degree on the resume?

Answer: No, studying for five years is not the same as having a degree, which means you can't claim that the candidate obtained one. You can add that the candidate studied for five years at higher professional education level, as long as you don't suggest he or she graduated. You can also add that the candidate has higher professional education-level experience.

- Do not misrepresent issues or withhold relevant information in your communication with Ordina or external parties, not even at the request of the client.

Example: You submitted a quote for several licenses. Your client has asked you not to include specific software in the quote and not to mention that the software is not compatible with some of the client's application, as this would slow the acquisition process.

Question: Do you follow through on the client's request?

Answer: No. By omitting relevant information about the software in your formal quote, you are misleading the client with regard to the functionality of the program and the compatibility of the applications.

3. Business and financial administration

It is extremely important that our business and financial administration is complete, accurate, and consistent. Not only is this required by law, Ordina's credibility and reputation depends entirely on accurate administration. This applies equally to timesheets and to invoices.

- With regard to business and financial administration, make sure to provide an accurate representation of the facts and figures.

Example: A client asks you to help him solve a 'budget problem': After 31 December, additional hours can no longer be added to an Ordina project. Finalising the project would require an additional 225 hours, but it's already 23 December. The client asks you to book the hours worked after 31 December on the timesheets of Ordina employees working on a different project for the same client. Coincidentally, this project has the same hourly rate.

Question: Do you follow through with the client's request?

Answer: No. The solution proposed by the client would require you to deliberately change the timesheets of the involved employees, which would result in incorrect invoices and jeopardise the accuracy of Ordina's business administration. This is unacceptable, even though both parties are not seeking fraudulent financial gain (the client is paying Ordina the agreed rate).

- All transactions must be recorded in the correct accounting period and ascribed to the appropriate account and department.

Example: The case is the same as above, but this time the client proposes adding the hours to be worked in January to the invoice for December (under the heading 'Hours worked in December').

Question: Do you follow through with the client's requests?

Answer: No. This would mean the invoice for December – and therefore Ordina's internal financial administration – was inaccurate. The hours have not yet been registered for December. This is unacceptable, even though both parties are not seeking fraudulent financial gain.

An acceptable solution would be to invoice the January hours in December under the heading 'Hours to be worked' or to agree on a fixed rate to be invoiced in December for the remaining work.

- Provide an accurate representation of the nature of all transactions.

We all make mistakes. Honest, unintentional mistakes happen despite our best efforts to prevent them. That is not what this Policy is about.

Example: you discover an accounting error. Your colleague unintentionally applied the wrong VAT rate based on an old table. This was not done to financially benefit anyone.

Question: does this count as fraud?

Answer: No, it was a mistake. Your colleague did not purposefully act in conflict with the code of conduct or this policy.

4. Theft and embezzlement

Under this directive, theft and embezzlement are considered forms of fraud. It goes without saying that theft and embezzlement are always prohibited.

5. Questions or concerns?

If you are unsure how to handle a certain situation, please contact your supervisor or the compliance officer.

Failure to adhere to the Policy on Fraud may be met with disciplinary action on behalf of Ordina.

This Policy on Fraud is related to the following company policies:

- Policy on 'Use of company resources'
- Power of Procuration (*Procuratierichtlijn*)