



ANTI-BRIBERY POLICY

1. Policy

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the company's business is conducted ethically and responsibly.

2. Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Argentor is committed to conducting business ethically and transparently, adopting a zero-tolerance stance on bribery and corruption. We are dedicated to acting with integrity across all our business interactions and relationships globally, enforcing effective measures to prevent bribery.

Adhering to all applicable laws for combating bribery and corruption in every jurisdiction we operate, with strict compliance to Belgian laws both domestically and internationally.

3. Scope

3.1 Policy Recipients

In this policy, third party means any individual or organisation we come into contact with during the course of our work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;
- Charitable contributions.

3.2 Bribes

Bribery is prohibited in any form, either directly or through any third party (such as an agent or distributor).

3.3 Gifts and hospitality



Employees may not offer or accept any gift or hospitality, that could be regarded as illegal or improper, or which violates the recipient's policies; or are from/to public officials.

Argentor acknowledges that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered. Within these parameters, management may define specific guidelines and policies to reflect local professional and industry standards. Where this policy requires written approval to be given, the compliance officer shall put in place a process to maintain a register of all such approvals.

3.4 Facilitation payments

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to the compliance manager.

3.5 Political Contributions

Argentor does not make donations, whether in cash or any kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.6 Charitable contributions

Charitable support and donations are accepted and encouraged. However, these charitable contributions must be legal, ethical, and pre-approved to avoid misuse as a bribery cover.

4. Responsibilities

All employees must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Argentor. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

They must notify the compliance manager or the confidential helpline as soon as possible if there is a believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.



Any employee who violates this policy will face disciplinary action, which could result in termination of employment. Argentor has the right to terminate contractual relationship with clients, suppliers and other contacts if they breach this policy.

5. Record-keeping

Argentor keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

6. Reporting concerns

Employees are encouraged to raise concerns about any issue or suspicion of malpractice. If they are unsure whether a particular act constitutes as bribery or corruption, or if they have any other queries or concerns, these should be raised with the compliance officer or through the confidential helpline.

7. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, can be worried about possible repercussions. That is why Argentor encourages openness and supports anyone who raises concerns, even if they turn out to be mistaken.

8. Training and communication

Mandatory training is part of the admission process for all new employees, existing employees will receive regular training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

This policy will be communicated to all business partners at the beginning of the relationship and periodically thereafter.

9 Policy governance

The board of directors oversees policy compliance, the Compliance Officer is responsible for daily implementation and monitoring.

Signed on the 16th March 2023 for and on behalf of Argentor Essayeurs