

# Anti-Bribery & Corruption Policy

ENGLISH





## INTRODUCTION

Esdec Solar Group employees are expected to conduct company business with integrity, honesty, and fairness. This applies equally to all business transactions worldwide. As set out in our Code of Conduct, bribery and/or any other forms of unethical business practice by Esdec Solar Group employees will not be tolerated. We expect you to avoid any behavior which constitutes (an attempt of) bribery. Compliance with the applicable anti-bribery and corruption laws is crucial in the day-to-day operations of Esdec Solar Group.

The purpose of this Anti-Bribery & Corruption Policy is to provide clear rules and guidance on our Anti-Bribery & Corruption standards. Practical instructions will be given on how we can conduct

business to comply with anti-bribery and corruption laws worldwide.

This Anti-Bribery & Corruption Policy applies, without exception, to all Esdec Solar Group companies and their employees worldwide. To ensure understanding of the standards, this Policy will be presented and signed upon hire, upon Policy updates, and annually. Furthermore, this Policy extends to any person or entity associated with, or performing services for or on behalf of, Esdec Solar Group. All the above parties mentioned are therefore expected to comply with this Policy and to follow the anti-bribery and corruption laws that Esdec Solar Group is subject to.

This Anti-Bribery & Corruption Policy will not address every situation you may encounter or provide answers to all questions regarding anti-bribery and corruption laws. If you have any questions or doubts as to this Policy and whether certain behavior is in line with these laws, or the scope of applicable laws in your day-to-day business, you should contact your manager or the legal department without delay.

In this Anti-Bribery & Corruption Policy, “**Esdec Solar Group**” refers to **Esdec Solar Group B.V.** and/or each of its subsidiaries around the globe that are majority-controlled or owned, directly or indirectly, by **Esdec Solar Group B.V.**

## ANTI-BRIBERY AND CORRUPTION PROHIBITIONS

**Esdec Solar Group** will not tolerate bribery, and more generally fraud, money-laundering, kickbacks, financing terrorism, or any other form of unethical business practice. Anti-bribery and corruption laws are similar in that they prohibit any behavior which enables any person to misuse his/her position for personal gain. Taking bribes and offering bribes are both illegal.

Compliance with these laws is crucial for **Esdec Solar Group** in all the countries where it conducts business. Violations of applicable anti-bribery and corruption laws may have reputational and economic impact and can lead

to sanctions against the **Esdec Solar Group** companies and employees. This section of the Anti-Bribery & Corruption Policy provides guidelines on the main elements of anti-bribery & corruption laws and will outline behavior that will not be accepted.

**Esdec Solar Group** wins business on the strength and quality of our product and service offerings. We do not give gifts or other things of value to public officials to obtain a business advantage, and we do not permit others to do so on our behalf. Nor do we engage in bribery of private parties. We would not, for example, give a gift to a government official, private partner, or prospective partner to influence a decision relating to **Esdec Solar Group** or to obtain a contract. Likewise, **Esdec Solar Group** employees are prohibited from accepting gifts, payments, or business entertainment from a supplier or prospective supplier, in return for business or better pricing. This Anti-Bribery & Corruption Policy – in line with anti-bribery & corruption laws – prohibits requesting, accepting, or agreeing to accept, for yourself or for anyone else, a payment, gift, or favor to influence a business decision or outcome.

## BONA FIDE EXPENDITURES

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Reasonable and bona fide expenditures, such as travel expenditures, will be permitted if they are related to the promotion, demonstration, or explanation of products or services, or to the execution or performance of a contract with a (potential) partner or supplier. For additional details and for specific travel rules, please refer to [Esdec Solar Group's Travel Policy](#).

## GIFTS, HOSPITALITY AND ENTERTAINMENT

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[Esdec Solar Group](#) recognizes that certain limited gifts and business entertainment may fall within the bounds of our standards of business integrity. Therefore, it is permissible for [Esdec Solar Group](#) employees to offer or provide gifts, entertainment, or other things of value to a private party when they are modest in value, consistent with applicable law and local business practice, and are not offered to gain a business advantage. When dealing with public officials, however, employees must take particular care to ensure that they are following our policies and guidance, since gifts or business entertainment that may be permissible when dealing with a commercial customer may be illegal or unethical when dealing with public officials. Employees should report any gift or event to their manager.

## LOCAL LAW

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Expenditures or payments which are permitted under local law, and which are considered reasonable and not excessive, may result in an exception to the anti-bribery and corruption laws. However, [Esdec Solar Group](#) employees must not, either by commission or omission, take part in local business customs that conflict with this Anti-Bribery & Corruption Policy.

[Esdec Solar Group](#) employees will not accept, offer, or give anything of value that could compromise an employee's judgment, inappropriately influence others, or reflect negatively on [Esdec Solar Group](#). This includes making illegal or improper political contributions and providing or receiving gifts or business entertainment in return for an improper business advantage. In all cases, employees and those representing [Esdec Solar Group](#) are expected to avoid even the appearance of doing something that does not reflect [Esdec Solar Group's](#) standards of integrity and honesty.

For example, some governments have rules prohibiting their employees and officials from accepting anything of value from the public, which may include paying for an official's travel or hotel accommodations, and others may even include buying a meal for a government official. Moreover, in some countries, businesses may be controlled by the government, making it

difficult to distinguish between commercial and government officials. All **Esdec Solar Group** employees are expected to comply with local laws and regulations. If you have any questions about local laws and regulations, you are urged to contact your manager before you act.

## **PRACTICAL DO'S & DON'TS**

### **THE FOLLOWING POINTS OUTLINE EXPECTATIONS THAT ALL ESDEC SOLAR GROUP EMPLOYEES WILL:**

- not pay, promise or offer bribes;
- not solicit, request or accept bribes;
- not solicit, request or accept “kickback” payments
- only give or receive gifts, tokens of hospitality or entertainment which is reasonable and bona fide
- provide for or accept stay/travel costs or other expenses which are not an inducement or reward to obtain or retain business and which is reasonable and bona fide
- not pay facilitation payments when they can be avoided
- remember that they are a representative of **Esdec Solar Group** while traveling for business.

## **SPEAK UP**

If you observe or suspect any misconduct which may result in a (potential) violation of this Anti-Bribery & Corruption Policy, we encourage you to speak up to allow **Esdec Solar Group** to address the situation proactively. **Esdec Solar Group's** Speak Up Policy describes how and where you can speak up about suspected misconduct without fear of retaliation. Furthermore, it describes what you may expect from **Esdec Solar Group** when you speak up, and what steps will be taken after you raise a concern.