

As part of our CSR program, we hereby communicate our Anti-Corruption Policy Statement.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and will implement and enforce effective systems to counter bribery.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if the Company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

We will abide by the anti-corruption laws in every country in which we operate and in particular the Bribery Act [*Public bribery (art. 246...250 SW) + Private Bribery (art. 504bis en 504ter SW)*] that covers the Group's activities in every country where it operates and not only in Belgium.

As we are doing business with international clients, ECS is aware of the other important legislations such as the Foreign Corrupt Practice (15 U.S.C. §§ 78dd-1, et seq) and the UK Bribery Act 2010.

What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Examples:

Offering a bribe. You offer a potential client tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe. A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organization to ensure we continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official. You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as a request for a visa or work permit. Because this offer is made to gain a business advantage for us, the offence of bribing a foreign public official has been committed as soon as the offer is made.

Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties provided that such hospitality is given or received in accordance with the Company's Travel and Expenses Policy and Conduct Policy and provided that the following requirements are met:

- not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- complies with local law;
- given in the Company's name, not in your name;
- does not include cash or a cash equivalent (such as gift certificates or vouchers);
- appropriate in the circumstances. For example, in the Belgium it is customary for small gifts to be given at Christmas time;
- takes into account the reason for the gift, of an appropriate type and value and given at an appropriate time; and
- given openly, not secretly.

Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or 'kickbacks' of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in Belgium, but are common in some other areas in which we operate.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment.

Donations

Political donations. We do permit contributions from the Company to political parties in certain circumstances upon prior approval of the Excom but these are never made in an attempt to influence any decision or gain a business advantage and will always be publicly disclosed. Such political donations are subject to the laws of the country in which such donations are made, and subject to any financial limits contained in those laws. Individuals that desire to make political contributions are free to do so, but such contribution must comply with Belgian Laws, and must be made in the individual's, and not the company's, name.

Charitable donations. We do permit charitable donations but these must not be offered to gain a business advantage and they are to be legal and ethical under local laws and practices. When in doubt, consult your manager or Excom. We permit our employees to volunteer for participation in community activities.

Actions you should take

Record keeping and reporting. It is important that you keep records of any actions that could potentially be interpreted as bribery. This ensures that there is an appropriate paper trail to refer to in the event of prosecution. Likewise, report any actions to your manager and/or the Excom.

Responsibilities for enforcement. Management is responsible for ensuring their teams are fully informed of policy requirements. They are also responsible for adopting and enforcing appropriate controls and taking the steps necessary to ensure compliance with this policy by all employees, subcontractors, and consultants.

How to raise a concern

If you have any doubt or concern about any situation relating to the policy, seek guidance from your manager before doing or omitting to do anything that could compromise your position within the Company.

If any manager should require further guidance on a specific case then this should be referred to a member of the Excom.

What to do if you are a victim of bribery or corruption

It is important that you tell a member of the Excom as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Training and Communication

Training on this policy forms part of the induction process for all new employees. Relevant (re)training is part of our annual recurring training program.

This policy is communicated to all levels and departments of the organization by means of publication on the intranet, ECS sharepoint and bulletin boards.

Our zero-tolerance approach to bribery and corruption is also communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Policy Ownership

The Anti-Corruption Policy is issued by the Executive Committee (Excom).

It is the responsibility of Excom that this policy is aligned with the ECS business strategy, culture and organization and complies with our legal and ethical obligations.

The Excom shall continuously motivate all employees to adhere to the policy and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

Monitoring & review

The Quality coordinator monitors the effectiveness of this policy, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are subject to (internal) audits to provide assurance that they are effective in countering bribery and corruption. Annual review takes place during the strategy update session.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Quality Coordinators.

This policy does not form part of any employee's contract of employment and it may be amended at any time.