



ANTI-CORRUPTION POLICY

Solutions30

Solutions for New Technologies

Table of contents

1. Introduction and relevance	p.3
2. Terms and definitions	p.3
3. Overarching policy on anti-corruption	p.4
3.1. Facilitation Payments.....	p.4
3.2. Solicitation and Extortion	p.4
3.3. Gifts, hospitality, and invitations	p.5
3.4. Public officials and holders of pollical office	p.5
3.5. Conflict of interest	p.6
3.6. Donations, sponsorship, and charity	p.6
3.7. Third Parties	p.6
3.8. Books and records	p.7
4. Non-Compliance and Breach	p.7
5. Measures to prevent and fight corruption	p.7

1. INTRODUCTION

Solutions 30 SE (**Solutions 30** or the **Company**) and its subsidiaries (together referred to as **Solutions 30 Group**) have established and adopted this global Anti-Corruption Policy not only to comply with national and international laws combating corruption but also to conduct business ethically and in accordance with the standards defined by Solutions 30's Code of Conduct (the **Code of Conduct**).

Corruption is a criminal offense and can have serious consequences for employees and companies, such as high penalties and other official sanctions, loss of competition and claims for damages against the company.

Solutions 30 must comply with the antibribery and corruption laws and regulations of every country in which it operates, which collectively prohibit any form of corruption, bribery or influence peddling. These anti-corruption laws — such as the French "Sapin 2" law or the UK Bribery Act — are generally broad in their scope and application. They make it illegal for anyone to offer, promise, give, solicit or receive – directly or indirectly – money or "anything of value" to or from a public official or someone in the private sector in order to obtain or retain business or secure some other "improper advantage".

Anyone who fails to comply with this Anti-Corruption Policy and the related laws will be subject to the appropriate disciplinary action.

This Anti-Corruption Policy details the anti-corruption principles set out in our Code of Conduct and defines our anti-corruption standards. It outlines the different types of corrupt practices such as conflicts of interest, facilitation payments and gifts, hospitality and invitations. It contains specific behavioral requirements relevant to the prevention of corruption and serves to ensure that all applicable anti-corruption laws are complied with in the course of the Solutions 30's business activities.

The principles set out in this policy apply to all our employees, at all levels of the Solutions 30 Group.

2. TERMS AND DEFINITIONS

This chapter provides definitions of terms used in the policy to support a common understanding.

2.1. Bribery

Bribery means any offering, promising or giving (active bribery) and soliciting, demanding, receipt, agreement to the receipt or acceptance (passive bribery) of anything of value as an inducement of an action (or lack of action) which is improper, illegal, corrupt, unethical or a breach of duty. Any attempt to bribe shall be included in this definition.

2.2. Conflict of interest

When an employee's objective decision-making ability is influenced by her/ his own interests or the interests of third parties and her/ his business decisions are no longer made for the exclusive benefit of the Solutions 30 Group.

2.3. Corruption

Collective term for criminal offenses of bribery and corruptibility (active and passive).

2.4. Donations

Free contributions in the form of money or services without legal obligation to support charitable or political causes that are provided free of charge.

2.5. Entertainment

Plays, concerts, sports events and other events, where the entertainment is the primary purpose of the event.

2.6. Extortion

Threatening or using violence to obtain something of value.

2.7. Facilitation payments

Advantages in the form of small payments to secure or expedite a routine government action to which one is legally entitled.

2.8. Gifts

Gratuitous benefits of all kinds such as tips, favors, discounts or other tangible or intangible property with monetary value.

2.9. Hospitality

Hospitality includes drinks, refreshments, and meals.

2.10. Public official

All employees of governments, ministries, authorities or other agencies thereof or international organizations as well as persons acting in an official capacity for or on behalf of any of the aforementioned institutions.

2.11. Solicitation

Coercing another person to commit a criminal act.

2.12. Sponsorship

Sponsorship is a direct or indirect financial contribution to a particular event or series of events organized by an individual or a legal entity in order to promote the own brand or reputation.

2.13. Third Party

Any entity or individual other than Solutions 30 or its subsidiaries, for example subcontractors, suppliers or clients.

3. OVERARCHING POLICY ON ANTI-CORRUPTION

This chapter covers different types of corrupt practices and specifies behavioral requirements relevant to the prevention of corruption.

3.1. Facilitation Payments

Facilitation payments (see definition in 2.7) are bribes and punishable by law in most countries. Solutions 30 explicitly prohibits facilitation payments.

Example: Offering money to a public authority for speeding up a service that XY is entitled to.

3.2. Solicitation and Extortion

Solutions 30 supports employees who are solicited or extorted by others to make contributions.

If a public official or another person attempts to solicit an improper payment or similar from a Solutions 30 employee in exchange for an improper advantage, the employee must refuse. However, providing such pay-

ments may be exceptionally justified if the payment is provided in order to prevent a serious threat to the life, health or safety of yourself, a colleague or a family member.

All (attempted) solicitation and extortion payments must be immediately reported to the Group Head of Risk & Compliance via email, with precise details of the situation.

Example: A local public official threatens a Solutions 30 employee with imprisonment if she/ he does not provide the requested payment.

3.3. Gifts, hospitality, and invitations

Gifts, hospitality and invitations that are accepted, given or extended can quickly raise the appearance of corruption and lead to criminal liability. Solutions 30 employees should never give or accept any excessive gifts or similar benefits, directly or indirectly, to or from third parties. Gift, hospitality and invitations may be allowed if they are reasonable in value and frequency, within the range of customary business courtesies and are not made at a time or in a way that could influence or could be perceived to influence a decision.

Gifts, hospitality and invitations should never influence a Solutions 30 employee's business decision or be seen as influencing the person receiving them. Furthermore, the gift or invitation may only be sent to the business address of the recipient.

Possible allowed gifts, hospitality, and invitations may include:

- Travel expenses directly related to business purposes, e.g., an office visit.
- Meals within reasonable value and frequency, e.g., a working lunch or dinner.
- Attendance in an official capacity at functions.
- Low value promotional gifts and courtesy gifts, e.g., promotional items such as pens and calendars. These gifts must be clearly recognizable as gifts (company logo, an enclosed greeting card, etc.).

If there is any doubt about the appropriateness of gifts, hospitality and invitations, employees shall immediately consult with their respective supervisors. If there is subsequently a need for further advice, the Group Head of Risk & Compliance can be contacted.

It is strictly forbidden to:

- Give, promise to give, offer or solicit a payment, gift, travel, hospitality or other benefit with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Accept payment or the promise of payment from a third party in case of suspicion it is offered with the expectation that it will obtain a business advantage.
- Accept a gift, hospitality, travel or other benefit or the promise of such from a third party in case of suspicion it is offered with the expectation that a business advantage will be provided in return.

Example: Inviting an external business contact who is responsible for the contract award for which Solutions 30 has also submitted a bid to increase the chances.

3.4. Public officials and holders of political office

Public officials are often subject to significantly more stringent rules and restrictions than private individuals. Bribery of a public official is a criminal offense and is prosecuted in all countries. Any relationship with public officials must be in strict compliance with the rules and regulations to which they are subject.

Generally, gifts, hospitality and invitations to public officials are prohibited. Never give gifts to reward a public official for decisions she or he has made. However, conference materials, appropriate collateral materials and low-value promotional gifts are generally allowed.

If there is any doubt about the appropriateness of gifts, hospitality and invitations, employees shall immediately consult with their respective supervisors. If there is subsequently a need for further advice, the Group Head of Risk & Compliance can be contacted.

Example: Using personal contacts with a public official to influence the final decision in favor of Solutions 30 and win the tender in exchange for tickets to a sports event.

3.5. Conflict of interest

Solutions 30 employees shall always act in the best interests of the Company and must therefore avoid or promptly remedy any situation in which financial, business or personal interests or activity conflict or may conflict with the interests of Solutions 30 or its business partners. Employees must identify actual and potential conflicts of interest in advance and conduct professional activities only in the best interests of Solutions 30. Even the appearance of any preference based on personal relationships must be avoided in their business interactions.

If potential or actual conflicts of interest arise, the employee concerned is obliged to immediately inform her or his supervisor.

Example: An employee who is responsible for managing contracts and buying services holds a personal relationship with someone who works for a company that supplies Solutions 30.

3.6. Donations, sponsorship, and charity

Donations and sponsorships may constitute hidden bribes. They must comply with ethical standards and there must be no doubts about their legality.

Solutions 30 prohibits political donations. Charitable donations must support Solutions 30's social commitment stated in the Code of Conduct. They must never be offered or given, either directly or indirectly, to individuals or organizations to obtain any business advantage for Solutions 30. This has to be ensured upfront. Any sponsorship is exclusively to support the Solutions 30 brand. Employees are therefore obliged to ensure that a sponsorship payment is not connected with a business transaction and, in particular, does not constitute consideration for a business order. The sponsorship has to be agreed in writing, specifying the contribution amount, the recipient, the intended purpose of the contribution, and the sponsoring activity.

Any charitable donation and sponsorship payments must be coordinated with the board and the Group Head of Risk & Compliance.

Example: Making a donation to a client's charity as part of the Solutions 30's bid.

3.7. Third Parties

Solutions 30's success also depends on the trustful cooperation with other third parties.

Therefore, Solutions 30 will only engage with third parties when there is legitimate need for the services or the goods they provide. It must be ensured that the third party acts lawfully in all its business activities, that the prices for the services and goods correspond to the market value and that the third party is qualified and authorized to provide the services or goods. The receipt of such services and goods must always be documented transparently and correctly.

Prior to entering into a new business relationship, a Third Party Due Diligence must be conducted. All business partners are required to comply with our values and standards, which are also set out in our Business Partner Code of Conduct.

Example: Contract with a business partner where the service described therein is not actually provided and is rather intended to disguise an illegal purpose.

3.8. Books and records

Solutions 30 must maintain accurate and complete books and records. Books and records encompass any and all documents created or received relating to the business of Solutions 30, including commercial books, accounts, invoices, business correspondence and any other document which is clearly business related such as quality and legal records.

All financial transactions must be accurately and completely documented and regularly reviewed. Any cover-up, incomplete, incorrect or misleading entries in commercial books are prohibited.

Solutions 30 prepares its records consistent with internal standards, tax laws, and all other applicable laws and regulations.

Example: Moving expenses to another department to disguise the fact that the budget has been used up.

4. NON-COMPLIANCE AND BREACH

Breaches of this policy constitute a violation as defined in the Whistleblower Policy and may result in disciplinary and other actions up to and including termination of employment or contracts in case of business partners. Violations of anti-corruption laws may also subject individuals to civil damages, criminal penalties and other sanctions, including imprisonment.

Non-Compliance with this policy can be reported confidentially according to our Whistleblower Policy (see below).

5. MEASURES TO PREVENT AND FIGHT CORRUPTION

1. Raising awareness and training

- Solutions 30 anti-corruption policy communicated internally and externally.
- training of employees organized on a regular basis and imposing the training of staff members who are most exposed to the risk of corruption, regardless of their managerial level.
- Ad hoc quizzes for employees related to this, and other, policies.

2. Request for advice or guidelines

An employee who wishes to request an advice or a guideline, to find information, ask a question on a matter related to corruption refers to his/her manager or Group Head of Risk and Compliance by sending an e-mail to s30.compliance@solutions30.com.

3. Whistleblowing mechanism

Solutions 30 has implemented a whistleblowing mechanism where any non-compliance with this policy may be reported confidentially. The whistleblowing mechanism can be accessed at: <https://solutions30.integrityle.com>.

Solutions 30 have established and adopted a global whistleblower policy to guarantee the highest possible standards of openness, honesty, integrity, ethics and accountability. It is applicable to all subsidiaries of Solutions 30 Group and across all jurisdictions where we operate. Solutions 30 whistleblower policy is available at the Company website.

4. Third party due diligence policy

Solutions 30's third party due diligence ("TPDD") policy outlines the mandatory procedures for entering, monitoring, renewing, or terminating any third-party relationship. In addition to the applicable procedures, the policy also describes the roles and responsibilities and specifies the mandatory documentation and consequences in case of non-compliance and breach.

The objective of the TPDD policy is to analyze the integrity and reliability of business partners in order to avoid or at least minimize financial and reputational damage to Solutions 30 Group resulting from the actions of business partners.

5. Recruitment of key managers

All key managers, including but not limited to the new Management Board and Supervisory Board members) are subject to a background check prior to entering into any relationship, whether employment or services contract.

6. Monitoring

Solutions 30 Group set up procedures for the monitoring and the evaluation of the compliance measures implemented throughout the Group. The implementation of this policy together with other policies and procedures, will be audited, monitored and evaluated under the supervision of the Group Head of Risk and Compliance.

Luxembourg, June 2022

SOLUTIONS 30 SE
3 rue de la Reine
L2418 Luxembourg
Website: www.solutions30.com

Solutions30
Solutions for New Technologies

www.solutions30.com