

Eurowag Anti-Corruption Statement

Responsible behavior is the basic layer of our strategy at Eurowag. To maintain and increase the level of trust, it is of utmost importance that we behave responsibly in everything we do, at all layers of the organization, every day. Eurowag therefore considers **responsible behavior as an absolute pre-condition** to successfully implement its strategy and fulfil its role in the society.

This means that the mindset of all Eurowag-staff should go even beyond regulation and compliance. The basic principles are embedded into our Code of Ethics values of Respect for our clients, colleagues, society and Eurowag itself, together with our Responsive and Result-driven spirit. The foundation of responsible behavior is **integrity**, which entails honesty, correctness, transparency, and confidentiality, combined with a sound risk awareness.

Therefore, we **have a zero-tolerance towards all forms of bribery and corruption**, and we require compliance with all anti-bribery and anti-corruption laws in all markets and jurisdictions where we operate. These laws include the UK Bribery Act as well as other similar laws and regulations in the countries where we operate.

Eurowag requires all employees, including the Board of Directors, Associated Persons, and Third Parties to comply with the principles of its Anti-Corruption and Anti-Bribery Directive in all their actions and services they provide for, or on behalf of Eurowag. Eurowag's Anti-Corruption and Anti-Bribery program and policies are finally overseen by the Board of Directors.

Eurowag's Anti-corruption and Anti-bribery program is built on:

- Clear statement of CEO's or general management on Anti-corruption and Anti-bribery culture they expect, and consequences of potential breaches,
- Detailed policies and procedures prepared based on results of risk assessments that provide reasonable assurance that Eurowag's no-bribes policy and specific objectives for countering bribery are achieved. This anti-corruption and anti-bribery commitment of Eurowag is also reflected in HR policies,
- Compliancy with accounting and external financial reporting rules,
- Designated investigating team for investigating (alleged) bribery cases. The lead is given to Independent Investigation Unit.
- Periodic reviews, evaluation and update of anti-corruption and anti-bribery program,
- Annual risk assessment to evaluate the nature and the extent of Eurowag's exposure to potential internal and external risks of bribery, based on predefined criteria. This risk assessment considers the following risk types: business partnership risk, country risk, sectoral risk, transaction risk and business opportunity risk,
- Minimum requirements before establishing a contractual relationship with other financial institutions, associated 3rd parties, joint ventures, tied agents, intermediaries, suppliers, partners in an Eco-system, with the following 3 elements as minimal deliverables:
 - Ethical/Bribery Due Diligence,
 - Partners must agree with Eurowag's principles on anti-corruption and anti-bribery,
 - Contract should include reference to anti-corruption and anti-bribery principles, incl. the clause to terminate a contract if corruption and/or bribery is proven.
- Annual communication plan for issuing communications on anti-corruption and anti-bribery through available channels, proportionate to corruption risk,

- Training program on anti-corruption and anti-bribery proportionate to the corruption risk,
- Record keeping of breaches against anti-corruption and anti-bribery procedures,
- Internal reporting on issues regarding implementation of Anti-Corruption Program as well as on specific breaches,
- Groupwide gift policy,
- Groupwide police for the protection of whistleblowers.

Associated policies that act as a basis for Responsible Behavior within Eurowag:

- Eurowag Code of Ethics
- SpeakUp Policy