

Anti-bribery policy

1. Introduction

1.1

This anti-bribery policy has been established to define the responsibilities of the organization and all persons working for or on its behalf with regard to complying with and enforcing the zero-tolerance policy on bribery and corruption.

In addition, this policy serves as an information and guidance document for everyone working for OSPL Nederland B.V. It helps in recognizing and dealing with bribery and corruption, and in understanding the associated responsibilities.

2. Policy statement

2.1

OSPL Nederland B.V. is committed to conducting its business activities in an ethical and honest manner. The organization implements and maintains systems to prevent bribery.

2.2

OSPL Nederland B.V. applies a zero-tolerance policy toward bribery and corruption. We strive to act professionally, fairly, and with integrity in all our business activities, both nationally and internationally.

OSPL Nederland B.V. recognizes that bribery is a criminal offense and that involvement in corruption can lead to serious consequences, such as exclusion from tenders, high fines, and reputational damage.

3. Scope of the policy

3.1

This anti-bribery policy applies to all employees (temporary, permanent, or contract-based), consultants, contractors, interns, and all other persons working for or on behalf of the organization.

3.2

For the purpose of this policy, a third party is defined as any person or organization with whom the company interacts or collaborates. This includes (potential) customers, suppliers, distributors, business partners, agents, advisors, government bodies, and public organizations, including their representatives, officials, and political parties.

3.3

All agreements with third parties must be documented in clear contractual terms, including provisions requiring the third party to meet minimum standards and procedures related to anti-bribery and anti-corruption.

4. Definition of bribery

4.1

Bribery is the offering, giving, promising, requesting, agreeing to, receiving, accepting, or soliciting of anything of value or any advantage with the intent to influence a decision or action.

4.2

A bribe includes any form of reward, incentive, or benefit offered to obtain a commercial, contractual, regulatory, or personal advantage.

4.3

Bribery is not limited to offering bribes. Receiving or accepting a bribe is also a criminal offense.

4.4

Bribery is prohibited. Employees must not engage in bribery in any form, directly or indirectly, nor through third parties. In case of doubt about whether something may constitute bribery, advice must be sought from management.

5. What is and is not allowed

This policy covers the following topics:

Active and passive bribery

Gifts and hospitality

Facilitation payments

Political contributions

Charitable contributions

5.1 Active and passive bribery

Active bribery is offering, promising, or giving a bribe. Passive bribery is requesting, receiving, or accepting a bribe. Both forms are prohibited.

Examples of active bribery

Bribing a government official to obtain a contract

Bypassing controls or safety regulations

Providing bribes through an intermediary

Small payments to customs to speed up processes

Hiring relatives of officials to exert influence

Paying travel or sponsorship costs to influence decisions

Examples of passive bribery

Security: granting access in exchange for payment

Procurement: demanding a “kickback” for awarding a contract

Recruitment: requesting payment for hiring or promotion

Fraud: providing information in exchange for payment

Information trading: sharing confidential data for tenders

5.2 Gifts and Hospitality

OSPL Nederland B.V. accepts reasonable and appropriate forms of hospitality, provided that:

there is no intention to influence;

no return favor is expected;

it is legally permitted;

it is given on behalf of the organization;

it does not involve cash or cash equivalents;

it is appropriate to the circumstances;

its value and timing are reasonable;

it is provided openly;

it is not aimed at influencing decisions;

it is not given to government officials without prior approval.

If it is inappropriate to refuse a gift, it must be reported to management.

All gifts must be reported. In case of doubt, advice must be sought.

5.3 Facilitation Payments and Kickbacks

OSPL Nederland B.V. does not allow facilitation payments. These are payments made to speed up routine actions.

Kickbacks are also prohibited. These are payments in exchange for business advantages.

5.4 Political Contributions

The organization does not make donations to political parties or candidates.

5.5 Charitable Contributions

Donations to charities are permitted, provided they are transparent and not used to disguise bribery. All contributions must comply with laws and regulations.

6. Responsibilities of Employees

- 6.1 Employees must read, understand, and comply with this policy.
- 6.2 Everyone is responsible for preventing, detecting, and reporting bribery.
- 6.3 Suspicions of bribery must be reported immediately to management.
- 6.4 Violation of this policy may result in disciplinary action, including dismissal.

7. Reporting and Protection

7.1 Reporting Concerns

Employees are encouraged to report suspicions of bribery as soon as possible.

7.2 Victim of Bribery

If an offer or request for bribery is received, it must be reported immediately. Management will assess the situation and initiate an investigation if necessary.

7.3 Investigation

The investigation includes:

- collecting evidence;
- establishing facts;
- taking measures (e.g., terminating a contract);
- disciplinary actions;
- reporting to authorities if required.

7.4 Protection

Employees who report in good faith are protected from retaliation.

Retaliation includes dismissal, disciplinary action, or unfavorable treatment.

8. Training and Communication

- 8.1 New employees receive training on this policy.
- 8.2 The policy is communicated to suppliers and partners.

9. Record Keeping

The organization maintains accurate financial records and has internal controls for all payments.

10. Monitoring and Evaluation

The Compliance Officer is responsible for monitoring and evaluating this policy.

The policy is reviewed regularly and updated where necessary. Internal controls are audited to ensure effectiveness.

Employees are encouraged to suggest improvements.