

Policy Control

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NAME	ANTI-CORRUPTION, ANTI-BRIBERY, AND LOBBYING POLICY
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VON DER HEYDEN GROUP

15.0 ANTI-CORRUPTION, ANTI-BRIBERY AND LOBBYING

1. Scope

At Von der Heyden Group (the “Group”), we are committed to conducting business in an honest and ethical manner and strictly prohibit any form of corruption, bribery, or unethical lobbying practices. This AntiCorruption, Anti-Bribery and Lobbying Policy (this “Policy”) sets forth the Group’s commitment to ensure that its group companies, affiliates, and others acting on the Group’s behalf abide by all international and local anti-bribery and anti-corruption laws, in countries in which it conducts business. This Policy applies to all employees, officers, directors and contractors of the Group.

2. Policy Statement

2.1 *Prohibitions against Corruption, Bribery and Unethical Lobbying*

We prohibit any form of corruption, bribery, or unethical lobbying practices, whether direct or indirect, in any transactions with any person, including government officials, customers, suppliers, or other business partners. The Group prohibits giving, offering, promising or receiving anything of value, directly or indirectly, with the intent to obtain an improper business advantage for the Group.

2.2 *Gifts and Hospitality*

Our employees, contractors, and agents must not offer, give, solicit, or accept gifts, favors, or hospitality that may be perceived as an attempt to influence a business decision or create an improper advantage. Any gifts or hospitality must be reasonable, proportionate, and appropriate, and must not compromise the recipient’s judgment or integrity.

2.3 *Facilitation Payments*

The Group prohibits all personnel from offering or authorizing the offer of “facilitation payments,” which are small, unofficial payments (sometimes referred to as “tips” or “grease payments”) to public officials to expedite the performance of routine government actions. By contrast, expediting payments made to a government agency itself (not to an individual) that have been officially authorized (such as an official fee to expedite passport renewal) are not facilitation payments and, accordingly, are permissible.

2.4 *Receiving Improper Advantages from Third Parties (e.g. Vendors)*

All personnel and representatives of the Group may not accept any excessive gifts, gratuities or entertainment from companies, such as vendors, that have business dealings with any Group company. Gifts, entertainment, meals or social invitations that are part of normal, ethical business practices are acceptable. In case of doubt, kindly consult with your manager and/or the Group legal department for further information.



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2.5 *Political Contributions*

We work with the government of the day and with other political parties as appropriate. As a matter of general principle, the Group does not make any political contributions to political candidates, parties, organizations or any other political entity, at all levels of government.

2.6 *Lobbying*

When conducting lobbying activities, it is done in a transparent and ethical manner, in compliance with all applicable laws and regulations. All oral or written communications to a senior elected or appointed government official, must be approved by Executive Director or Chairman, prior to such communication.

2.7 *Trade Associations*

Von der Heyden Group entities, may participate in trade associations for a variety of reasons, including networking, building industry skills, civic participation and monitoring of industry policies and trends. Their participation in trade associations, including membership on a trade association board, does not mean that the Group agrees with every position a trade association takes on an issue.

2.8 *Reporting*

All employees, contractors, and agents must report any suspected violations of this Policy to their supervisor or manager immediately. Any violations will be promptly investigated and appropriate action will be taken. Violations of this Policy may result in disciplinary action up to termination of employment as well as the potential for prosecution, fines or imprisonment in accordance with applicable laws.

3. Conclusion

This Policy sets out our commitment to conducting business in an honest and ethical manner and sets clear guidelines and standards for all employees, contractors, and agents to ensure compliance with all applicable anti-corruption laws, regulations, and ethical standards. This Policy will be communicated in writing to all employees and through training on a periodic basis.