

ANTI-BRIBERY AND CORRUPTION POLICY

Purpose and Scope

AQUASYSTEMS INTERNATIONAL NV ('the Company') values its reputation for ethical behavior, financial probity, and reliability. The Company recognizes that any involvement in bribery will reflect on its image and reputation and so seeks to foster a culture of honesty and integrity in all of its business activities.

It is a criminal offence to offer a promise of or provide or request or accept a bribe. It is also an offence for a commercial organization to fail to prevent an incident of bribery committed either by the organization or by someone associated with it in order to obtain or retain a business advantage. The Company operates a strict no tolerance policy towards bribery in all its forms whether directly or through third parties and seeks to prevent this by maintaining processes and procedures that are appropriate and proportionate to its assessment of the level of risk.

This Anti-Bribery and Corruption Policy applies to all members of the Company, full and part-time employees, temporary staff and directors. It also applies to business partners who supply services to the Company including agents and intermediaries. Any breach of this Policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action. All employees, as well as any organization, body or individual acting on behalf of the Company are required to read and understand all aspects of this Policy and to abide by it.

What is Bribery and Corruption?

Bribery and corruption can occur in many forms. Understanding and recognizing what forms these can take and when they might occur is a key step in guarding against them.

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, improper, unethical, in breach of a duty to act impartially or a breach of trust.

Corruption is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government.

Gifts and Hospitality

This Policy is not intended to prohibit normal and appropriate hospitality providing it is customary, proportionate and properly recorded.



Gifts, hospitality and entertainment can be bribes if they are intended to influence a business decision. The receipt or offering of gifts, entertainment or hospitality in connection with matters properly related to business will be permitted provided that these activities fall within reasonable bounds in terms of value and frequency and where they are a normal and appropriate expression of business courtesy. All employees, partners, agents, or intermediaries are required to ensure that the offer or acceptance of a gift or an incidence of hospitality does not create or appear to create a conflict of interest for those involved. Under no circumstances can gifts of cash, or cash equivalents (of any amount), be accepted. Any hospitality or gift provided or accepted should be affordable, appropriate to the occasion and not likely to damage the reputation of the Company. There should be a clear business justification for any hospitality or gift which is funded by the Company or accepted by anyone acting on its behalf.

Unacceptable hospitality and gifts are those which might influence or be seen to influence the outcome of the award of business or to benefit personally the recipient or anyone connected to the recipient. High value hospitality or gifts may not be accepted under any circumstances and any such offer should be brought to the attention of the Managing Director of the Company as soon as possible.

The staff and directors of the Company will not offer or accept gifts or hospitality if the Company thinks this might impair objective judgment, improperly influence a decision or create a sense of obligation, or if there is a risk that it could be misconstrued or misinterpreted by others.

The acceptance of any gift or hospitality of any value needs to be brought to the attention of the Company so that it can monitor the position on a collective basis in order to ensure that it does not unknowingly become subjected to the potential of an accumulated obligation of which it is otherwise unaware.

Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all staff and directors. Employees should be aware of the Company's Whistle Blowing Policy which exists to encourage a culture of openness; outlining the Company's commitment to treat all such matters in confidence and to act in good faith in accordance with the details set out in the Policy.

How to raise a Concern

If an employee or other interested party has a concern or knows of, or suspects a violation of this Policy they should report it immediately. All information received will be treated seriously and investigated appropriately. If the person concerned acts in good faith, believing the information provided to be accurate, the Company will endeavor to protect them even if they are wrong. In the case of an employee such action will not disadvantage the employee's career or adversely affect their relationships at work. The Company will not tolerate any form of discrimination or bullying of someone who has spoken up in good faith. In the first instance an employee should speak to their Line Manager. If the employee does not feel comfortable doing this they may contact the Managing Director directly. The Company will treat the information in confidence and if the employee prefers they may report anonymously.



Legislation

The primary legislation is the Belgian Criminal Law art. 246 and 504 bis, this created:

- two general offences covering the offering, promising or giving of an advantage and requesting, agreeing to receive or accepting of an advantage,
- the discrete offence of bribery of a Foreign public official,
- the new offence of failure by a commercial organization to prevent a bribe being paid for or on its behalf (it will be a defense if the organization has adequate procedures in place to prevent bribery).

Signed:

AQUASYSTEMS INTERNATIONAL N.V.
Represented by its C.O.O.

Aurélien Goyeau

