

C-MAC GROUP'S ANTI-CORRUPTION POLICY

1. Introduction

This Policy is part of the Code of Business Ethics which serves as the foundation for our daily activities. It has been developed to ensure that everyone – regardless of position knows, understands and acts in accordance with ethical standards in all aspect of our business.

The Anti-Corruption Policy applies to all companies in the C-MAC Group, ('the Group'). The policy describes the operating principles of the Group's commitment to preventing and combating all forms of corruption and similar or equivalent behaviour, to ensure compliance with the relevant legislation and best practices in this area. It is closely aligned with other internal procedures and policies within the Group.

2. Principles of the Anti-Corruption Policy

The Group adheres to a zero-tolerance approach to any form of corruption. Corruption is contrary to our aspirations to be a responsible company, especially as we want to actively participate in business as a Trustworthy Company.

The Anti-Corruption Policy applies to all of us, as well as to colleagues and business partners acting on our behalf. All executives are required to play a key role in fostering an organisational culture in which corruption has no chance of occurring and is unacceptable in any form. The Anti-Corruption Policy should be widely communicated and promoted to the Group's employees (employees are understood to be persons employed under both employment contracts and civil law contracts), supported by training initiatives to enable proper understanding and use of its principles in daily work.

Managers are responsible for monitoring and supervising compliance with the Policy by those under their authority. Group employees who violate this Policy are subject to disciplinary action, which may lead to their dismissal, removal or termination.

3. Prevention and elimination of active corruption and related behaviour

a) Active corruption and related behaviour

The Group strictly prohibits all corruption, whether towards public officials, companies and their employees and individuals, or any other action that could be interpreted as such behaviour, in particular paid protection. In general, the Group prohibits attempts to obtain benefits from third parties in exchange for illegal favours: promised, granted or implied.

In particular, ‘facilitation payments’, i.e. illegal or unrecorded payments or other material benefits aimed at securing or expediting an administrative process, are prohibited, even if the very purpose of the process is legitimate.

b) Tendering and acquisition of contracts

The Group prohibits actions that restrict the freedom of access of bidders in public procurement, that lead to their unequal treatment or that distort free and fair competition.

c) Gifts and invitations to third parties: customers, suppliers, partners, public administrations or private institutions

Managers, employees of the Group and third parties acting in the name of and on behalf of the Group may offer courtesy gifts or invitations to business partners. Those who offer them must do so in the exclusive interest of the Group, within the limits of their powers and duties, to an identified and known person and must make it clear that the Group is the originator of such gift or invitation.

Gifts or invitations must be thoughtful and consider the business circumstances justifying the gift or invitation as well as the function of the person to whom the gift or invitation is addressed. Such gifts or invitations must be reasonable in nature and should be treated openly by both the Group and the giver. They should not give rise to suspicion of influencing decisions concerning the Group.

The Group strictly prohibits the offering of gifts or invitations in a surreptitious or indecent manner, in financial or equivalent form, such as cash, gift vouchers, travel vouchers, transferable movable property, loans, etc.

4. Preventing and combating passive corruption and conflicts of interest within the Group

a) Passive corruption

The Group strictly prohibits managers, employees and third parties acting on its behalf or for its benefit from engaging in passive corruption, i.e. soliciting or accepting illegal or disguised benefits, of any nature or quantity, in return for favourable action by the Group or a third party.

b) Gifts and invitations received

Managers and employees, as well as third parties acting for or on behalf of the Group, may courteously receive gifts or invitations from business partners, subject to the following conditions:

The Group strictly prohibits:

- soliciting gifts or invitations;
- accepting gifts or invitations from an unknown or unidentified person;
- accepting cash or cash equivalents such as gift vouchers or negotiable items;
- gifts and/or invitations must always be given and accepted openly.

Within the framework of this Policy or possible regulations, managers in companies or employees may, under the authority of their superiors, set indicative or mandatory limits on the value of such gifts.

Anyone who receives gifts and invitations that may give rise to doubt (in particular as to their value, nature or circumstances) must notify their superiors immediately. Gifts or invitations that do not comply with the above rules cannot be accepted. If this is not possible, they should be returned. If this return proves to be physically or organisationally impossible, you should contact your supervisor, who will determine the further course of action.

5. Intermediaries, suppliers and partners

The activities of the Group's partners, including its customers, suppliers, service providers and intermediaries must not jeopardise the Group, if they fail to comply with international and national regulations and benchmarks for the prevention of corruption and related behaviour.

The parties should endeavour to include in their contracts a clause obliging them to comply with good business practices and stipulating that proven failure to do so may result in the immediate termination of their cooperation.

6. Accounting and financial control rules - Fraud

Any payments or benefits granted on behalf of the Group must have a legitimate and defined purpose and must be made to actual and known beneficiaries, in compliance with:

- international law on sanctions, embargoes, anti-money laundering and financing of terrorism;
- the delegation of decision-making powers and banking authorisations issued in accordance with Group procedures;
- approval methods for orders, deliveries and payments and accounting in accordance with Group procedures.

It is forbidden to make any undocumented payments, e.g. not included in the accounting system, or any payments indicating a false purpose or beneficiary or if the true purpose or beneficiary is not clearly identified.

7. Notices

Managers and employees as well as associates of the Group who suspect a breach of the above rules may notify the Group by contacting their supervisor. Suspected violations of the Anti-Corruption Policy or other laws may also be reported by e-mail: personeelsdienst@cmac.com.

Persons outside the Group (customers, suppliers, contractors) may report any concerns by sending an e-mail to personeelsdienst@cmac.com.

The aforementioned reports shall be recorded and dealt with by the Group's Legal Department in consultation with the Group's Board of Directors.

The Group undertakes to protect the confidentiality of the details of these notifications, in particular the identity of the notifiers and, where applicable, the suspected infringers, as well as the facts disclosed. Subject to applicable local laws, such notifications may be made on an anonymous basis. Unless the whistleblower shows bad faith, the Group undertakes not to take steps to identify the author of the report.

Furthermore, the Group prohibits any action, in particular disciplinary or professional, against a person who, in good faith, makes a report, regardless of the action resulting therefrom, even if the facts disclosed prove to be inaccurate.

8. Final provisions

- Every employee of the company is obliged to read this document and strictly comply with its contents.
- Violation of the provisions of the Anti-Corruption Policy shall subject the employee to liability under the terms and conditions provided herein and by law.
- Each case of non-compliance with this Policy shall be dealt with separately.

Effective Date: 30/06/2025

Signed:

Riwan Tamic

**CEO
C-MAC**

Danny Detemmerman

**COO
C-MAC**