



Anti-Bribery and Corruption Policy

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Introduction

This policy sets out the standards and the expected behaviour that the Indaver group (hereafter “Indaver”) values as a company to prevent all forms of bribery and corruption in all of its activities, business lines and operations. It provides a framework for responsible, honest and fair business conduct, which is essential to our business. This policy applies to all persons working for Indaver, i.e. Indaver employees, agents, consultants, interns, self-employed and other individuals and businesses that represent Indaver.



Definitions

- Bribery means dishonestly persuading someone to act in your favour by giving them a gift of money or another inducement.
- Corruption means the abuse of entrusted power for private gain, which can be instigated by individuals or organisations. It includes practices such as facilitation payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the undertaking's business. This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage.
- Gifts may refer to: cash or any objects with a certain value that are given to or by Indaver representatives in relation with their work within Indaver and which directly or indirectly improve their financial situation. This concerns, amongst other things, cash, consumer goods, discounts, branded items, etc., but also other forms of hospitality such as (business) meals, drinks, accommodation, travel, (business) trips, sporting or cultural events or other expenses relating to activities.
- Lobbying means activities carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of governments, governmental institutions, regulators and the European Union institutions, bodies, offices and agencies, or standard setters.
- Political donation means any financial, monetary or in-kind contributions that would support a political party, politician or organisation.



Principles

We strive to conduct our business in a responsible manner and to prohibit all acts of bribery and corruption. Indaver is committed to meeting the anti-corruption and bribery requirements of relevant legislation in the countries and regions in which it operates, including those dealing with the bribery of government's public officials or civil servants. Therefore, it is not only compliant with EU-regulations, but also with, for example but not limited to, the United Kingdom (UK) Bribery Act, national criminal codes and the United Nations Convention against Corruption. Where local legislation is stricter than this policy, the stricter provisions of the local legislation will prevail on this policy.

We hold high ethical requirements, which we apply in-house, as well as on our suppliers and contractual partners:



Employees

- We act in accordance with our internal guidelines to make sure that our behaviour is ethical and fair. We request our employees and anyone representing Indaver to conduct business with integrity and transparency, and to avoid any appearance of conflicts of interests.
- Employees who refuse unethical propositions are protected against negative consequences or retaliation.

Suppliers and Contractual Partners

- Our suppliers and contractual partners are expected to endorse these standards as well, since this is the basis for our sustainable, ethical relationship with them. By doing so, we can maintain our integrity and remain worthy of the trust of all our stakeholders.
- We encourage our suppliers and contractual partners to adopt a written and formal anti-bribery and corruption policy, and to fight passive or active bribery and corruption, as an expression of their core values of integrity and responsibility as well as to counteract corruption effectively. They must make every effort to encourage compliance with this policy by their own suppliers.

We request our employees and suppliers to conduct business with integrity and transparency

Conflict of Interest

A conflict of interest arises when someone's personal interests clash with the organization's interests. Our policy aims to avoid legal problems and disagreements among the stakeholders.

Employees

- We expect all our employees to act according to our guidelines to avoid (any appearance of) conflicts of interest.
- We are transparent and do not take advantage of any family, social or political connections to gain advantage within business dealings.
- Indaver will thus avoid any interaction with a contractual partner's employee or public official/civil servant that may conflict, or appear to conflict, with that employee or public official/civil servant acting in the best interests of their employer.
- Any potential conflict of interest is to be disclosed to your supervisor.

Suppliers and Contractual Partners

- We expect all our business partners to act according to our guidelines to avoid (any appearance of) conflicts of interest.
- Our business partners are transparent and do not take advantage of any family, social or political connections to gain advantage within business dealings.
- They will thus avoid any interaction with an Indaver employee that may conflict, or appear to conflict, with that employee acting in the best interests of Indaver.
- Everyone can use our whistleblower system to report concerns on actions made by Indaver's employees, management, or business partners.



Political Donations and Lobbying

Indaver does not give any political donation, unless :

- This would be in line with the local political culture and with the goal to help build a sustainable waste management. For example, Indaver could consider supporting certain organisations that conduct research in sustainable waste management solutions.
- The donation complies with applicable legislation, ethical codes, etc.
- The donation is formally budgeted and registered within the company documentation.

Moreover, specific, designated functions within Indaver commit to lobbying in a fair manner in order to inform decision makers and to reach solutions regarding sustainable waste treatment within democratic decision-making processes. These lobbying activities cannot be abused, with the aim of improperly pressuring or influencing decision makers. The principles of integrity, transparency and fairness should at all times be respected.

The principles of integrity, transparency and fairness should be respected at all times



Gifts

Gifts and hospitality can be acceptable and appropriate business practices in order to build and maintain goodwill in business relationships. However, if gifts and hospitality are improperly managed, they have the potential to constitute bribery or corruption, which is strictly prohibited. This policy, therefore, wishes to set out standards and principles regarding the handover and acceptance of gifts, donations or other forms of hospitality in order to exclude this risk of corruption and bribery.

- Gifts should always be given or accepted by using common sense and the donor's and the recipient's intentions must be in line with this policy. Under no circumstances should inappropriate gifts be accepted or offered, that go beyond the bounds of hospitality, or that compromise integrity, or independence, or create the impression of doing so.
- Courtesy gifts are allowed when they are business-related, appropriate, and for specific occasions (e.g. anniversaries, birthdays, public holidays, or other social events) or for other justified reasons.
- Indaver representatives will respect specific instructions regarding gifts from their contract partners, suppliers, officials and authorities.
- Gifts cannot be used for bribery, putting pressure on other parties or authorities, or to speed up certain official procedures for obtaining licenses, visas or official documents, nor may these gifts seem to be used with that purpose. Moreover they cannot be used to obtain exemptions from the obligation to pay certain amounts, such as taxes, fines or social security contributions. The same goes for the family members of those parties.
- Any situation where the acceptance of a gift could lead to a real, potential or perceived conflict of interest should be avoided at all time. The timing of gifts should therefore be well-considered (e.g. not during a tender procedure, prior to signing important contracts, prior to obtaining requested permits, licenses, visa or documents, etc.).
- Indaver provides specific internal processes to examine the type, occasion, frequency and timing of such gifts. It wishes to guarantee full transparency relating to the gifts received and given.
- Gifts cannot lead to giving information on a competitor's offer, or on ongoing processes (e.g. procurement).
- Cash payments are never acceptable, unless provided otherwise in this policy. For example, donations to charities or sponsorships in cash or in kind, are only acceptable if appropriate under local law and practices and when in line with this policy.
- Indaver employees or representatives who are offered one or more inappropriate gifts, should report this to the Indaver legal department.
- All expenses or payments must be substantiated with relevant documents and should be recorded with a description of their purpose in line with applicable anti-bribery and corruption recording legislation.

Gifts and hospitality are to be well-managed to exclude the risk of bribery and corruption.

Monitoring and Reporting

Indaver maintains effective policies, processes and procedures. It monitors and reports publicly on this topic, both to the authorities and to the wider audience including other businesses and the public, if required by law. Indaver will also review this policy where appropriate, due to changes in applicable legislation or relevant standards.

Indaver implements management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this policy. Indaver implements mechanisms to identify, determine and manage risks in all areas addressed by this policy and with respect to all applicable legal requirements.

We welcome concerns regarding actions made by employees, management, our board of directors and business partners linked to the Indaver operations, e.g. third party agents, brokers, vendors, suppliers or contractors/subcontractors. Everyone can use the whistleblowing system to this end, which is a confidential channel through which persons or companies can raise concerns about possible or actual violations of laws or Indaver rules regarding, amongst others, money laundering, corruption, foreign trade controls, retaliation, etc. To guarantee the effectiveness of this whistleblowing channel, employees using this channel are protected against any negative consequences (e.g. dismissal).

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Any reports of unlawful conduct will be thoroughly investigated in an independent and objective manner in due time by the legal department.

We have a zero tolerance policy against any illegal practice, and more specifically, against bribery and corruption. Any violations of this policy by Indaver employees could lead to disciplinary sanctions or dismissal.



