



# Anti-bribery and Corruption Policy

14 March 2024



**Sif** OFFSHORE  
FOUNDATIONS

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## Introduction

The Code of Conduct of Sif Holding N.V. (hereinafter: "Sif") promotes honest and ethical business without bribery or corruption. This Anti-Bribery and Corruption Policy (hereinafter: "Policy") is to ensure that it is clear to everyone within Sif and its subsidiaries (hereinafter together referred to as: "Company") how to guarantee that our activities, either in the Netherlands or abroad, cannot be linked to any form of bribery or corruption. We therefore apply a zero tolerance policy to bribery and corruption.

## article 1 To whom does this policy apply

This policy applies to everyone who works for the Company on the instructions of the management or staff of the Company. Therefore, it applies to managers and other employees of the Company, temporary workers, interns, consultants, suppliers and subcontractors.

## article 2 What do we understand by bribery or corruption?

What is corruption and what is bribery?

Corruption is a collective term and means that someone abuses his/her position for private or business gain. Bribery and extortion all fall under the scope of corruption. Corruption often goes together with other criminal offences such as forgery and money laundering. The explanations in this article under 2.1-2.4 serve to make this more explicit.

2.1 Bribery or corruption means any financial or other inducement or reward for illegal or unethical behavior. Bribery or corruption can take the form of financial compensation, gifts, loans, hospitality, services, discounts or any other benefit whatsoever.

2.2 Bribery or corruption also includes offering, promising, requesting or accepting the methods of bribery or corruption mentioned under 2.1.

2.3 Any form of bribery or corruption is strictly prohibited and our decision-making processes must remain free from any form of such.

2.4 In addition to the above we refrain from:

- (a) making or offering any payment, gift, hospitality or other benefit in the expectation that a business benefit will be obtained in return or that any person will be rewarded for a business benefit;
- (b) accepting any gift from a third party knowing or expecting that we will have to provide a service in return to that third party or any other related party; or
- (c) providing or offering any gift (also called a facilitation payment) to a government servant in any country in order to promote a priority position in the execution or completion of a routine or necessary procedure.

## article 3 Gifts and hospitality

3.1 This policy does not prevent the granting or acceptance of a gift, in the form of, for example, a business gift or hospitality in the form of a lunch or visit to a national sports competition, on legitimate grounds such as maintaining a good business relationship, building or maintaining an image or reputation or promoting Sif's products and services.



3.2 Gifts and hospitality must be appropriate in type and value, taking into account the circumstances and reason for the gift or hospitality. Gifts must not contain cash or cash-related compensation such as vouchers or gift cards and must not be given in secret. Gifts and hospitality must be provided in the name of Sif and never in the name of an individual.

3.3 Promotional or low-value gifts such as branded business gifts can be freely provided to or accepted from customers, suppliers and other business associates.

3.4 A gift or hospitality is not appropriate if it is lavish or extravagant, or if it can be seen as an incentive or compensation for preferential treatment.

## **article 4 Accountability**

4.1 We keep records of every gift or hospitality given or received that exceeds the amount or value of € 100. Gifts or hospitality that is offered to and accepted by customers, suppliers or other business associates that exceed a value or an amount of € 100 or more shall be registered via the declaration system of the Company. The registration must include the following information:

- Name and position of the Employee
- Name contact person, company and position of the business relation
- The reason for offering / accepting / refusing the gift
- The estimated value of the gift

4.2 All invoices and other documents relating to business contacts with suppliers and customers are archived completely and accurately. No accounts are kept outside the books or archives for the purpose of providing or receiving improper compensation or gifts.

## **article 5 Amendments**

The Executive Board may, with the approval of the Supervisory Board, amend or supplement this policy pursuant to a resolution to that effect. Any amendment made pursuant to this article 5 shall be subject to applicable laws and regulations.