

Appendix D: Anti-corruption & anti-bribery

Neways commits and pursues to uphold high and strict standards with regard to integrity and business conduct in all business interactions. Neways does in no way tolerate any form of bribery, corruption, extortion and embezzlement. We act fairly, professionally and with integrity. With regard to the foregoing we apply a zero tolerance enforcement.

This policy outlines the principles and accompanying behavior Neways expects from its employees and other stakeholders. Further it outlines our procedures and regulations to ensure compliance with anti-corruption and anti-bribery laws in the countries in which we operate.

Neways requires from all its employees and stakeholders at all times to act according this policy and to be aware of the below obligations and uphold them in their work relations and business conduct - inside and outside our organization. In addition, we ask our people to act responsibly and address a possible issue with their colleagues or promptly seek guidance when needed as per the procedure specified below.

It is contemplated that Neways to a reasonable extent will implement detailed procedures and standards related to training, due diligence, the recording of transactions, and other areas, to implement the terms of this policy. As part of our approach we take action to ensure that our anti-corruption and anti-bribery policy, standards and procedures are communicated to all employees, and where necessary and appropriate stakeholders. Particular areas of focus with stakeholders include continued strengthening of due diligence procedures and clearly articulated requirements (for example through the use of standard contract clauses in purchase contracts).

Any employee who violates the terms of this policy, or who has direct knowledge of potential violations of this policy, will be subject to disciplinary action. You shall not mislead or hinder investigators inquiring into potential violations. Termination of employment is a possible consequence. Any stakeholder who violates the terms of this policy, who knows of and fails to report to Neways potential violations of this policy may have their contracts re-evaluated or terminated and/or being claimed for damages in accordance with applicable laws.

We herewith notify you, employees and stakeholders of Neways, that any breach of anti-corruption and anti-bribery laws and/or not acting according this policy causes severe adverse effects to Neways and additionally such behavior can be treated as a personal criminal offence which in some scenarios can lead to imprisonment.

Prohibited behaviors

1. Corruption

Corruption is an abuse of a position of authority and trust for private gain. Corruption increases inequality and thus also fosters unfair competition.

In some countries, corruption may manifest through facilitation payments. Facilitation payments are payments that may speed up certain (governmental) administrative processes, even though the

outcome of these processes is predetermined. Neways does in no way allow corrupt acts or behavior and any facilitation payments to be made by employees or stakeholders.

2. Bribery

Bribery is a payment in cash or other valuable means (e.g. goods, services, influence) in exchange for a favor, action, influence, contract, or other favorable behavior that would otherwise not be given by the recipient. We expect our employees and stakeholders not to engage in any bribery behavior, either directly or through third parties. This includes giving a bribe or receiving a bribe, but also attempts of bribery.

A bribe can be a monetary payment, but may also take the form of (private or work related):

- Contracts, services, goods or price reductions for these, for private use
- Payments or donations to a third party linked to Neways
- Extravagant gifts, travel expenses or disproportionate entertainment
- Loan (guarantees)
- Tickets for sport or entertainment events
- Tangible items
- Other benefits or advantages may be possible.

3. Extortion and blackmail

Extortion is the practice of obtaining money, goods, property (including intellectual property), services, business relations etc., by using threats or force. This can for instance involve withholding payments in exchange for unjustifiable or unrelated goods or property. Neways employees and stakeholders are not allowed to engage in such behavior and we encourage them to speak up in case of suspicious behavior of Neways employees or stakeholders.

4. Impunity

Neways commits to equal treatment of all our employees and stakeholders. This means that all employees and stakeholders must follow the same rules. In cases this does not happen, there will be no distinction in who will or will not be disciplined this regardless of level, function, etc. Neways expects from its employees and stakeholders that they never encourage impunity of its people, business relations or other (e.g. third party) representatives.

Third parties and anti-corruption

Corrupt behaviors as indicated above and/or breach of any anti-corruption or anti-bribery law by Neways or stakeholders working for and/or acting on behalf of Neways shall not be accepted and will be subject to a zero tolerance enforcement. Neways and stakeholders must comply with the Neways Code of Conduct, including this policy forming part of the Code of Conduct.

With reference to the foregoing and regarding the subject of this policy Neways requires that a due diligence should be performed or other appropriate business controls to be taken before engaging a third party representing and/or working on behalf of Neways. This due diligence or business controls should minimally include a consideration whether this proposed person is qualified or appropriate for the role (e.g. conflicts of interest), and whether the fee or compensation is appropriate.

Audits

Audits of Neways sites, operating units, stakeholders etc. may be conducted periodically to ensure compliancy with the requirements of this policy and applicable procedures and guidelines. Audits may be conducted internally by Neways, or externally by retained third parties. Audit documentation shall include performance improvement action plans.

How to speak up

If you (employee or stakeholder) suspect any corrupt behaviors outlined in this policy or other behavior which possibly endangers compliancy with this policy, we encourage you to do the following:

1. First try to talk to the person(s) that are suspected of the corrupt behavior and/or behavior which violates this policy.
2. For employee; if this does not result in an adjusted behavior, and you still believe your suspicion is justified or the violation continues, talk to your direct manager. If the manager also believes the suspicion justifiable or the violation continues, the manager should inform the HR Manager in your Operating Company.
3. For stakeholders; if this does not result in an adjusted behavior, and you still believe your suspicion is justified or the violation continues talk to the direct manager of the employee. If the direct manager also believes the suspicion justifiable or the violation continues the direct manager should inform the HR Manager in the applicable Operating Company and keep you updated.
4. Should the issue still not be resolved and/or the violation continues, please contact the Compliance Officer.
5. As a last measure, refer to Appendix N - Whistle Blower.