

ATLAS INEXCO

Anti-Bribery and Corruption Policy

To All Employees employed within Atlas Inexco.

One of Atlas Inexco's core values is to uphold responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. Atlas Inexco therefore has a zero tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships.

This Policy sets out Atlas Inexco's position on any form of bribery and corruption and provides guidelines aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations, not just within the Netherlands but in any other country within which Atlas Inexco may carry out its business or in relation to which its business may be connected
- enabling employees and persons associated with Atlas Inexco to understand the risk associated with bribery and to encourage them to be vigilant and effectively recognize, prevent and report any wrongdoing, whether by themselves or others.

Atlas Inexco's employees are required to:

- comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they conduct business
- act honestly, responsibly and with integrity
- safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

Any employee, whose conduct violates the provisions of Atlas Inexco's Anti-Bribery and Corruption Policy, will be disciplined in accordance with the Company's disciplinary procedure and the Dutch Civil Code.

Herman van der Kaay
Group Managing Director

Date created : 01st January 2015
Valid until : 31st December 2020