

## 1 INTRODUCTION

The company (\*) is committed to the highest standards of ethical conduct and compliance with all relevant laws and regulations, including those related to bribery and corruption. As part of this commitment, we have developed this anti-bribery and corruption policy to ensure that we do not engage in any actions that could be considered bribes or corrupt practices.

(\*) Company = All GEOxyz entities incl. GEO@Sea

## 2 SCOPE

This anti-bribery and corruption policy applies to all employees, contractors, and agents of the company

## 3 DEFINITIONS

For the purpose of this policy, the following terms have the following meanings:

- "Bribery" means the offering, giving, soliciting, or accepting of any undue advantage, whether directly or indirectly, as an inducement to or a reward for any act or omission in breach of a person's duty or trust.
- "Corruption" means the abuse of entrusted power for private gain, including the use of influence or position for personal benefit, or to gain an advantage for a third party.

## 4 POLICY STATEMENT

The company prohibits all forms of bribery and corruption, and will not engage in any activity that could be considered a bribe or a corrupt practice. This includes the offering, giving, soliciting, or accepting of any undue advantage, whether directly or indirectly, as an inducement to or a reward for any act or omission in breach of a person's duty or trust.

We expect all employees, contractors, and agents to act with integrity and to report any concerns about potential violations of this policy.

Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination of employment.

### 4.1 REPORTING

If you have any concerns about potential violations of this policy, or if you are aware of any activity that could be considered a bribe or a corrupt practice, it is important that you report it immediately. You can report your concerns through the following channels:

[legal@geoxyz.eu](mailto:legal@geoxyz.eu)

[QHSE@geoxyz.eu](mailto:QHSE@geoxyz.eu)

You can report your concerns anonymously, if you prefer. We will not tolerate any retaliation against individuals who report concerns in good faith.

### 4.2 TRAINING

All employees will receive training on this policy and the risks associated with bribery and corruption. We will also provide ongoing support and guidance to help employees understand their responsibilities under this policy.

### 4.3 MONITORING AND REVIEW

We will regularly review and monitor our compliance with this policy to ensure that we are meeting the highest standards of ethical conduct. Any concerns or breaches of this policy will be promptly addressed and appropriate corrective action will be taken.

## 5 CONTACT

If you have any questions about this policy, please contact DPA and HR Department.



Patrick Reyntjens  
CEO

Zwevegem, 20/12/2022