

Zero tolerance statement on anti-bribery principles

Instrument Solutions Benelux BV (hereinafter “**ISB**”) values guide the way we behave as individuals and the way we do business. At the heart of our values are the ISB Values.

The values state that we act with integrity, behaving honestly, prudently and responsibly, so that we can continue to earn the trust of all our stakeholders.

ISB has a zero tolerance towards bribery and corruption, regardless of the identity or position of the originator or recipient of the bribe. ISB Management expects all our employees to always do business in accordance with the highest standards of ethical behavior and honesty.

This also means we are committed to the prevention, deterrence and detection of bribery and corruption.

Bribery and corruption are criminal offences and are clear violation of the ISB Values.

Engaging in behavior or activities contrary to ISB’s Values, as well as all other applicable laws and regulations, violates our promise to our stakeholders.

We do not and will not pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we accept bribes or improper inducements or anything that could be perceived as such and we have similar expectations of our third parties and clients.

The ISB zero tolerance principles towards bribery and corruption also apply to third parties with whom ISB does business with or who are retained by ISB to perform services or deliver business for and on behalf of ISB.

The ISB anti-bribery and anti-corruption principles are summarized below:

Bribery and facilitation payments

All forms of bribery and all actions that in our opinion give the appearance of offering or accepting a bribe, including facilitation payments are prohibited.

Gifts and Entertainment

No ISB employee may offer or receive a Gift or an Entertainment, regardless of its value, which in our opinion might create or give the appearance of creating a conflict of interest, constitute an inducement or bribe, or violate applicable laws, regulations and/or the ISB Values. Any form of gifts, entertainment or other advantage offered and received must be subject to an assessment on its acceptability and appropriateness regardless of the amount or value.

Public Officials

Whilst our Policies do not prohibit legitimate business interactions with Public Officials or State-owned enterprises, these are subject to heightened attention and stricter conditions, such as pre-approvals and lower limits.

Travel and Accommodation

ISB employees should generally not accept or offer travel and accommodation related to corporate hospitality packages.

Political contributions/donations

ISB employees are not permitted to make gifts or political donations or to offer entertainment to political parties or candidates for political office.

Charitable contributions

ISB employees should ensure that charitable contributions are made to bona fide charities and are not used to conceal a bribe.

Recording and registration

ISB employees should ensure that expenses and payments related to third parties are registered and accurately recorded in the financial books.

Violations

ISB employees are encouraged to report violations via the internal reporting lines or using the ISB Whistleblower Policy.

Shareholders of ISB or third parties can report alleged irregularities of a general, operational and financial nature - including issues relating to accounting, administration and internal control - within ISB Group via: chief.compliance.officer@instrument-solutions.com

ISB will handle these complaints carefully.