



Anti Bribery and Corruption (ABC) Policy

Facilitation Payments and Kickbacks

PP Group does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty of action.

PP Group does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Charitable Contributions

PP Group accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions – and agrees to disclose all charitable contributions it makes.

- Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery;
- We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Legal Counsel.

Employee Responsibility

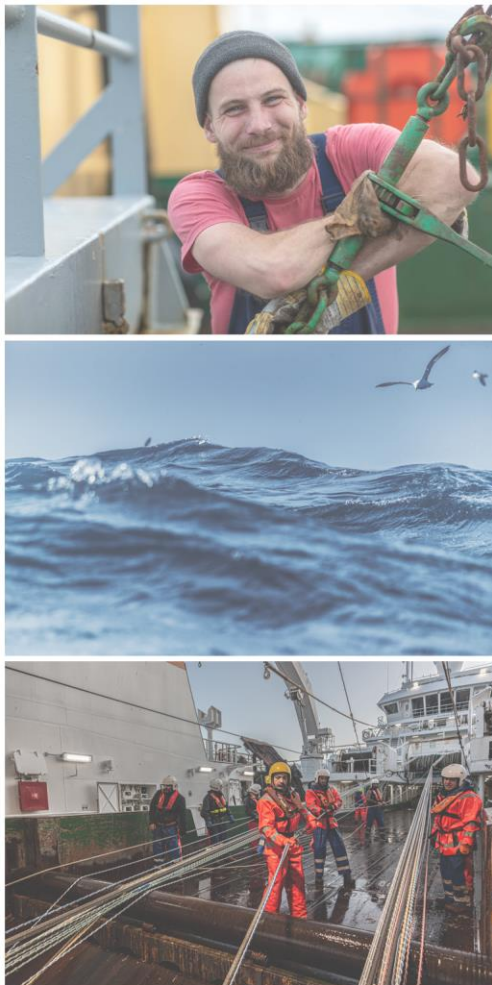
You have the obligation to read and follow this policy, to understand and identify any warning signs that may arise in their business activities and to escalate potential compliance concerns related to ABC to the CSR Department without notifying anyone involved in the transaction and should not take any actions prior to receiving advice and/or instructions.

Due diligence and record keeping

At the outset of each new business relationship PP Group carries out due diligence. And if necessary, established business relationships will also be reviewed to determine whether there are any barriers to continue that relationship. Various factors will determine the appropriate forms and levels of screening.

The Finance Department must regularly review established business relationships in close consultation with department managers. If there is any suspicion or indication that bribery or corruption could take place they should escalate to the CSR Department who will advise and/or give instructions on how to proceed.

In order to be able to assist in any investigation (both internal as external) it is essential that records can be provided as evidence of due diligence and monitoring of new and established business relationships. The Finance Department and department managers are there for required to maintain records of their efforts to comply with this policy and any additional advice and instructions provided to them by PP Group.





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Non-compliance and sanctions

Any director or employee who violates this policy may be subject to appropriate disciplinary action (including dismissal). Violation of this policy by any third party will also be reason for PP Group to reconsider the business relationship and possibly end the relationship all together.

Measures taken by PP Group are independent from possible sanctions imposed by competent authorities in case of violation of ABC laws.

Questions?

If you have questions about this policy please contact the CSR Department of PP Group via csr@pp-group.eu

This ABC policy, our procedures and internal audits are designed to ensure that PP Group complies with all applicable laws and regulations concerning anti-bribery and corruption and will be reviewed and updated on a regular basis to ensure that it remains current and effective.

Approved by the board of PP Group

Valkenburg, 20 November 2020

