

# **Anti-Bribery and Corruption Policy**

Policy N°: AEU-LEG- Record of Processing Activities – EN – P4

Subject: Anti-Bribery and Corruption Policy

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Approval status: Legal, CMD, IT

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### Policy Statement

Advantech Europe B.V. and its subsidiaries (collectively, “Advantech”) is committed to the highest ethical standards and full compliance with all applicable anti-bribery and anti-corruption laws, including but not limited to:

- **The UK Bribery Act 2010**
- **EU Anti-Corruption Conventions (1997, 2003)**
- **The OECD Convention on Combating Bribery of Foreign Public Officials**

Advantech has **zero tolerance** for any form of bribery or corruption. Such conduct undermines fair competition, erodes public trust, and exposes the Company and individuals to serious legal and reputational risks.

### 1. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to improperly influence the actions of another party.
- **Corruption:** Abuse of entrusted power for private or corporate gain.
- **Facilitation Payments:** Small, unofficial payments made to expedite routine actions by public officials—**strictly prohibited** under this Policy.
- **Third Parties:** Any external individual or organization acting on behalf of Advantech, including contractors, agents, suppliers, and distributors.
- **Staff Members:** Any officers, employees, consultants, trainees, home workers, part-time workers, fixed-term workers, casual workers, agency workers, volunteers, and interns of Advantech.

### 2. Prohibited Conduct

Staff Members and Third Parties must not:

- Offer, promise, give, request, or accept a bribe, facilitation payment, kickback, sexual favor, or any form of improper or undue advantage;
- Attempt to influence public officials or business partners through unethical means;
- Authorize or turn a blind eye to unethical conduct by third parties;
- Make or accept secret, excessive, or undocumented payments or gifts;
- Retaliate against anyone who reports concerns in good faith.

### **3. Gifts, Hospitality, and Entertainment**

- Gifts, hospitality, and entertainment offered or received by Staff Members or Third Parties must always comply with the following principles: Modest in value and infrequent;
- In line with reasonable and generally accepted business practices;
- Approved by management in accordance with internal policies;
- Not intended to influence business decisions or gain an unfair advantage;
- Declared and recorded transparently.

#### **Prohibited examples:**

- Gifts in the form of cash, coupons, gift cards, or personal services;
  - (e.g., Sales/Campaign Competition's) **only** if: organized by Advantech management.
  - Reasonable and customary for the occasion;
  - In compliance with local laws and customs.
- Benefits during contract negotiations;
- Anonymous or secretive exchanges;
- Gifts or hospitality exceeding EUR 40 without prior approval.

#### **Permitted with approval:**

- Modest items such as flowers, pens, wine, or holiday gift baskets (max EUR 40);
- Entertainment (e.g., meals, sports events) **only** if:
  - Attended by the host;
  - Reasonable and customary for the occasion;
  - In compliance with local laws and customs.

**Reporting:** All declarations must be submitted to: [AEU.Legal@advantech.eu](mailto:AEU.Legal@advantech.eu)

### **4. Political and Charitable Contributions**

- **Political contributions** on behalf of the Company are strictly prohibited without prior written approval from the **Board of Directors**.
- **Charitable donations** on behalf of the Company require prior approval from the Facility Department. Such donations must be lawful, transparent, and must never be used to obtain an improper business advantage or serve as a substitute for bribery.
- All contributions must be properly documented and approved in line with internal procedures.

## **5. Record-Keeping**

To ensure legal compliance and internal accountability:

- All expenses, gifts, and hospitality must be documented in full;
- All financial transactions must be accurately recorded in accordance with accounting standards and anti-money laundering rules;
- False, misleading, or incomplete records are strictly prohibited;
- Records must be retained in line with the Company's document retention policy.

## **6. Responsibilities**

- **Board of Directors:** Overall responsibility and oversight of this Policy.
- **Legal Department:** Implementation, monitoring, training, and handling of reported concerns.
- **Managers:** Promote awareness and ensure team compliance.
- **All Staff Members:** Read, understand, comply with this Policy, and report any concerns promptly.

## **7. Reporting and Whistleblowing**

Staff must report immediately:

- Suspected or actual bribery, corruption, or facilitation payments;
- Any improper requests or offers;
- Any other conduct that may violate this Policy.

**Reports may be made to:**

- Your line manager;
- **Legal Department** at: [AEU.Legal@advantech.eu](mailto:AEU.Legal@advantech.eu)
- **Whistleblowing channel** (where available).

All reports made in good faith will be handled confidentially. Retaliation is strictly prohibited.

## **8. Consequences of Breach**

Violations of this Policy may result in:

- Disciplinary action, including termination of employment;
- Termination of contracts with third parties;
- Civil or criminal prosecution, fines, and/or imprisonment under applicable laws.


## **9. Training and Awareness**

Advantech will provide regular anti-bribery and corruption training to Staff Members. Additional or role-specific training may be required based on location, function, or risk exposure.

**10. Policy Review**

This Policy will be reviewed **annually** or as required due to changes in law, regulation, or business operations. It does not form part of any employment contract and may be amended at the Company's discretion.

**For questions, reporting, or approvals:**

 [AEU.Legal@advantech.eu](mailto:AEU.Legal@advantech.eu)

**Legal Department**

**Advantech Europe B.V.**



RTA van Velzen

CM&D Director Europe

02/06/2025