EuroHydra Connect B.V.
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Anti-Bribery and Anti-Corruption Policy

1. Introduction

At EuroHydra Connect B.V., including all its subsidiaries (collectively, "EuroHydra Connect"), we are committed to conducting our business with integrity, honesty, and fairness. All employees of EuroHydra Connect worldwide are expected to comply with applicable laws, the EuroHydra Connect Code of Conduct, and related internal policies.

As a responsible international enterprise, our mission is to create and safeguard prosperity through the provision of advanced hydraulic technologies to global markets. Our most significant contributions—both economic and sustainable—stem from our core business, our people, and our operations. EuroHydra Connect has a strict zero-tolerance policy on bribery and corruption. We do not offer, pay, request, or accept bribes, facilitation payments, or any undue favors in pursuit of any improper business, financial, or personal advantage.

This Anti-Bribery and Anti-Corruption Policy (the "ABC Policy") reflects the interests of our stakeholders, including employees, shareholders, financial institutions, suppliers, clients, government entities, knowledge institutions, industry associations, NGOs, and the communities in which we operate.

2. Scope of the Policy

This policy applies to EuroHydra Connect, its subsidiaries, and all individuals performing work for the company worldwide. This includes employees, directors (statutory and non-statutory), temporary agency workers, and interns. References to "you" within this policy refer to individuals in these roles.

Integrity, honesty, and fairness are fundamental to our operations and are promoted in all interactions with customers, suppliers, and business partners.

3. Core Principles of the Policy

a. Anti-Bribery and Anti-Corruption

Bribery and corruption involve the direct or indirect offer, promise, payment, request, or acceptance of anything of material value in exchange for an improper advantage. This includes situations where an individual gives or receives something to induce behavior that is unethical or unlawful.

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We strictly comply with all applicable anti-bribery and anti-corruption laws, including but not limited to the OECD Anti-Bribery Convention, the UK Bribery Act, and the US Foreign Corrupt Practices Act (FCPA). Violations of these laws may result in severe criminal and civil penalties, including imprisonment or blacklisting, and can significantly damage our reputation and business relationships.

Employees are prohibited from engaging in any form of bribery or corruption, directly or indirectly.

Exception: If a payment is demanded by a public official and refusal would compromise your personal safety or that of others, you may make the payment. You must report such incidents to your direct manager in writing as soon as possible.

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b. Gifts and Hospitality

Exchanging reasonable gifts and hospitality may be part of customary business practice but must never be used to gain improper advantage.

Gifts and hospitality include any item of value, such as discounts, event tickets, travel, accommodations, or entertainment. They must:

- Be modest and not influence business decisions.
- Remain under a value threshold of EUR 100 (or local currency equivalent).
- Be approved by your manager if above that threshold.
- Never be in the form of cash or vouchers.
- Not be offered to or accepted from public officials without prior managerial approval.
- Never be given during or related to tendering processes.

In cultures where refusing a gift may be deemed offensive, discuss the situation with your manager if the value exceeds EUR 100.

Maintain accurate written records of all gifts and hospitality over EUR 100.

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c. Political Contributions and Donations

EuroHydra Connect does not make political contributions or donations, either in cash or in kind, to political parties, politicians, or candidates.

Charitable donations may be made in accordance with applicable laws, provided they are not used to gain improper advantage or reward misconduct.

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4. Your Responsibilities

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All employees are expected to avoid actions that may constitute or appear to constitute a violation of this policy, regardless of local customs or perceived business benefits. Full compliance with anti-bribery and anti-corruption standards is mandatory.

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5. Working with Business Partners

We expect our business partners—including joint venture partners, suppliers, and agents—to operate with the same standards of integrity.

- Ensure partners do not engage in bribery or corruption on our behalf.
- Record all transactions and payments transparently and accurately.
- Use written agreements that include anti-bribery and anti-corruption clauses.
- Avoid cash payments unless strictly necessary and justified.

Suppliers:
Suppliers must adhere to the EuroHydra Connect Code of Conduct. This should be contractually incorporated.

Agents:
Local agents may be necessary in certain jurisdictions. Before engagement:

- A background check by legal counsel is mandatory.
- Only use the approved standard contract containing ABC clauses.
- Contracts are limited to one year unless justified and approved by the General Manager.
- Renewals require a fresh background check.
- Fees must be reasonable and proportionate.

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6. Accountability and Oversight

The General Manager holds ultimate responsibility for this policy and its implementation.

Compliance is monitored by management and through internal and external audits. The General Manager reviews the policy annually.

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7. Reporting Violations

If you suspect or are aware of any breach of this policy, you must report it to your manager or the General Manager.

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8. Access and Training

This policy is available on the EuroHydra Connect intranet and website.

Regular training is provided via mandatory e-learning modules. Completion of the training is required to receive a certificate.

For further questions, you may contact the General Manager.

Document Information

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