

Anti-bribery and Anti-money Laundering Policy

1. Introduction

- 1.1 Integrity is important for our credibility in managing an international certification scheme. It has always been the policy of GMP+ International B.V. ("**GMP+**") to conduct business in an honest way, and without the use of unlawful or unethical practices, including but not limited to bribery and money laundering.
- 1.2 GMP+ attaches the utmost importance to this anti-bribery and anti-money laundering policy ("**Policy**"). All directors, officers and employees of GMP+ ("**Personnel**") are obliged to abide by all applicable laws and regulations and internal guidelines.
- 1.3 Third Parties that GMP+ cooperates with ("**Third Parties**") are expected to abide laws and regulation, including anti-bribery and anti-money laundering regulation.
- 1.4 GMP+ will apply a "zero tolerance" approach towards both GMP+ itself, Personnel and Third Parties regarding compliance. Any breach of this Policy will be regarded as a serious matter by GMP+ and is likely to result in disciplinary action.
- 1.5 GMP+ has appointed a Compliance Officer within its organization who is in charge of supervision of compliance with this Policy. The Compliance Officer can be reached through: complianceofficer@gmpplus.org

2. Applicability

This Policy applies to all Personnel.

3. Anti-bribery

Principle

- 3.1 GMP+ will not tolerate bribery (corruption). Bribery is contrary to fair competition and harms GMP+'s economic standing and reputation. In addition, many countries treat corruption as a crime, regardless of whether the actual act takes place in their jurisdiction or in another country.

3.2 Bribery is the offer or promise of something of value (for example money or expensive gifts, entertainment & travel), in exchange for an action which is illegal, unethical or a breach of trust (for example granting GMP+ a contract at conditions that are not based on economic grounds). Apart from being unethical, bribery is a criminal offence in most countries and exposes GMP+ and its Personnel to the risk of prosecution, fines and imprisonment, as well as to endangering GMP+'s reputation.

Rules

- 3.3 Bribery is under no circumstances allowed. Faking ignorance or "turning a blind eye" towards bribery is not allowed.
- 3.4 GMP+ requires written documentation for all services performed by Third Parties and shall require written (or digital) receipts of all payments made.
- 3.5 Personnel is prohibited from the direct or indirect transmission of anything of value to government officials, government employees, or the employees of state owned enterprises (or relatives of such) for any purposes, unless required for a legitimate business reason.
- 3.6 Personnel must be fully transparent regarding gifts and favours, with a value higher than EUR 50, they have received from third parties. Consequently, all gifts and favours must be reported to the Compliance Officer who will keep a register of such gifts and favours.
- 3.7 Personnel is not allowed to attempt to unlawfully influence business partners, whether through extraordinary favours and gifts or the grant of other advantages. This prohibition applies in all countries where GMP+ conducts its business.
- 3.8 As part of the above-mentioned general rules, Personnel must respect all (anti bribery) laws of the countries GMP+ operates in. In case of doubt, the Compliance Officer should be consulted on each occasion.

4. Anti-money laundering

Principle

4.1 GMP+ prohibits money laundering. Money laundering can damage the integrity, stability and reputation of GMP+. In addition, money laundering is a criminal offence in most countries and exposes GMP+ and Personnel to the risk of prosecution, fines and imprisonment, as well as endangering GMP+'s reputation.

- 4.2 Money laundering is defined as engaging in acts designed to conceal or disguise the true origin of criminally derived proceeds so that the unlawful proceeds appear to have derived from legitimate origins or constitute legitimate assets, for example by passing it through a sequence of banking transfers or commercial transactions. Money laundering also includes money used to fund terrorism, regardless of how it was obtained.

Rules

- 4.3 Money laundering is under no circumstances allowed for Personnel. .
- 4.4 GMP+ will assess the risks of money laundering yearly with the external account.
- 4.5 Personnel must be observant in monitoring for any unusual and potentially suspicious transactions/activity.
- 4.6 (Suspicions of) money laundering must be reported to the Compliance Officer timely and all incidents are responded to professionally and quickly.
- 4.7 As part of the above-mentioned general rules, Personnel must respect all (anti money laundering) laws of the countries it operates in. In case of doubt, the Compliance Officer should be consulted on each occasion.

5. Actions to ensure adherence to the policy

- 5.1 GMP+ is committed to ensure full adherence to this Policy and has various measures in place to ensure adherence. These measures are:
- a. Management of GMP+ will ensure that all employees are familiar with this Policy;
 - b. GMP+ Terms and Conditions of Employment will make a reference to this policy document.
- 5.2 GMP+ is committed to responding consistently and decisively to detected deficiencies. As deficiencies are discovered through audits, reporting mechanisms and other activities involved with the operation of this Policy, corrective measures will be taken to address the non-compliance. When a gap has been identified in the Policy or a compliance violation is detected, to prevent recurrence of a compliance violation remedial actions will typically include, among other actions, personnel education and training, additional monitoring and auditing, and can involve reporting to outside agencies as required.
- 5.3 Personnel violating the Policy, including the duty to report suspected violations, are subject to disciplinary action. Disciplinary actions will reflect the severity of the noncompliance, up to and including immediate termination of employment contracts or engagements.

- 5.4 Below is the procedure for reporting and investigating potential compliance issues:
- a. if at any time, Personnel becomes aware of or suspects illegal conduct or a violation of the Policy, they must report it to the Compliance Officer.
 - b. once a report is received, an appropriate person will conduct an investigation into the allegations to determine the nature, scope, and duration of wrongdoing, if any. GMP+ investigates all non-frivolous claims of wrongdoing.
 - c. if the allegations are substantiated, a plan for corrective action will be developed. Appropriate corrective action may include, for example, restitution of any overpayment amounts, notifying an appropriate governmental agency, disciplinary action or making changes to policies and procedures to prevent future occurrences.
 - d. retaliation in any form against anyone who makes a report of wrongdoing or cooperates in an investigation is strictly prohibited. Only where it has been clearly determined that someone has made a report of wrongdoing maliciously, frivolously, or in bad faith will disciplinary action be considered.

6. Policy review

The Compliance Officer shall review and propose amendments to the Management Team of this Policy on a regular basis to ensure the Policy is up to date.

Management Team

16 July 2019