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Anti-Bribery and Anti-Corruption Policy

INTRODUCTION

At ACTM Group B.V. and within our subsidiaries (together 'ACTM') we are committed to conduct our business with integrity, honesty and fairness. We, being all ACTM employees throughout the world, do this in compliance with applicable laws, the ACTM Code of Conduct and its underlying policies.

ACTM is a responsible international enterprise. Our purpose is to create and protect welfare and supply advanced visual information technology to the global markets. The areas where we can make the largest contribution, both to the world economy and sustainable development, are tied to our business, our people and our activities. ACTM does not tolerate any bribery and corruption. ACTM does not offer, pay, request or accept bribes, facilitation payments or any other favors for the purpose of acquiring or giving any improper business, financial or personal advantages.

The Anti-Bribery and Anti-Corruption Policy (the "ABC Policy") takes account of the interests of our various stakeholders. They include employees, shareholders and financial institutions, suppliers, clients, government bodies, educational and knowledge institutes, industry and society associations (including NGOs) and the communities in which ACTM operates.

TO WHOM DOES THE ABC POLICY APPLY

The ABC Policy applies to ACTM, its subsidiaries and all its employees performing work for ACTM throughout the world. This includes current employees and persons working for ACTM through an employment agreement, as a (statutory) director, worker through an employment agency or as intern. Any reference to 'you' in ABC Policy refers to persons in this group.

Integrity, honesty and fairness are fundamental parts of the way we do business, and we promote the same principles in our relationships with customers, suppliers and other business partners.

WHAT ARE OUR ANTI-BRIBERY AND ANTI-CORRUPTION PRINCIPLES

Bribery or corruption is the offer, payment, request or acceptance of unearned rewards of material value (bribes) or any other favors, directly or indirectly, for the purpose of acquiring or giving any improper business, financial or personal advantages. In essence this means that you give something to a third party to persuade that party to do something he or she should not do. The other way round is that a third party is giving you something to persuade you to do something you should not do.

Many countries and international organizations around the world have enacted anti-bribery and anti-corruption laws to combat corruption, like for instance the OECD Anti-Bribery Convention, the UK Bribery Act and the US Foreign Corrupt Practices Act ('ABC laws'). ABC laws are in general very similar in that they basically prohibit any behavior which enables a person to misuse his or her position for personal gain. Compliance with these laws is very important for ACTM in all those countries where it conducts business. Violations of ABC laws can lead to substantial criminal and civil penalties, as well as to sanctions such as imprisonment of individuals and blacklisting of ACTM. Clients expect strict compliance of anti-bribery and anti-corruption laws, whereby corrupt behavior may lead to exclusion of tender procedures or termination of contracts.

We apply the following guiding principles ('the ABC principles'):

a. Anti-Bribery and Anti-Corruption

ACTM does comply with the ABC laws and does not tolerate any bribery and corruption.

You cannot, directly or indirectly, offer, promise, pay, request or accept bribes, facilitation payments or any other favors to obtain or retain business or to secure any other improper advantage. Any form or allegation of corruption will harm the business interests and reputation of ACTM.

In the event that a request is made by a public official for a payment that would risk your personal safety or the safety of others, ACTM allows you to make such a payment under the condition that you submit a written report of the incident as soon as possible to your (direct) manager.

b. Gifts and hospitality

The provision of reasonable gifts and hospitality by or to clients and business partners like suppliers or joint venture partners may form part of the normal business practice as a token of appreciation and is in itself not unlawful. However excessive and unduly generous gifts and hospitality can amount to bribery, if they are used (with the intention) to persuade favorable treatment.

Gifts and hospitality means anything of material value, including but not limited to discounts, free tickets, loans or guarantees, prizes, travel, vacations and/or events.

You should only give and receive small business gifts and hospitality that will not influence a business decision and that are below the material value threshold. Any gift or hospitality with a value in excess of EUR 100.- (or the equivalent thereof in local currency) is deemed to be material. Gifts and hospitality above the maximum value of EUR 100.- (or the equivalent in local currency) may only be provided or accepted after prior approval of your (direct) manager. Dinners given or received in the normal course of business against a reasonable expense are excluded from this threshold.

You must furthermore check whether the giving or receiving of a gift or hospitality is permitted under applicable laws. In some countries the value threshold for gifts and hospitality to be qualified as unlawful lies below the ACTM threshold.

You should not give any gifts and hospitality to public officials without the prior approval of your direct manager. In addition, you may never offer or accept gifts and hospitality to or from a (legal) person involved in a tender process ACTM is participating in.

You should only offer or accept gifts and hospitality on a voluntary basis. Gifts and hospitality should never be requested or serve to obtain something in return.

You should not give or accept any monetary gifts (cash and/or vouchers).

In some countries refusing a gift and/or hospitality may be seen as offensive. In case the value of the gift and hospitality is more than EUR 100.- (or the equivalent in local currency), please discuss this dilemma with your (direct) manager.

You should keep a full and accurate written record of all gifts and hospitality provided by and/ or given to you of a value of more than EUR 100.- (or the equivalent in local currency), which you are able to show upon request.

c. Political contributions and donations

ACTM does not make any contributions or donations, in money or in kind, to political parties, political officials or candidates for public office. You should not make any such political contribution or donation on behalf of ACTM.

ACTM may make charitable and community donations in money and in kind and offer support to society on a voluntary basis in accordance with applicable laws, taking into account the relevant disclosure commitments. You should ensure that such donations do not reward any improper conduct or could otherwise be seen as corruptive.

WHAT IS EXPECTED FROM YOU

Compliance with the ABC laws is essential in the day-to-day business of ACTM. ACTM therefore expects you to avoid any behavior which constitutes a (potential) breach of the ABC Policy, regardless of the location and the local customs of the country where you are working and even if you think it would benefit the company.

HOW TO DEAL WITH BUSINESS PARTNERS?

At ACTM we are committed to conduct business with integrity, honesty and fairness in compliance with applicable laws, the ABC principles as well as the ACTM Code of Conduct. We expect our business partners, like joint venture partners, suppliers and agents to do the same. You should take care that business partners do not engage in bribery or corruption on our behalf or in our name.

In line with ACTM policies, you should record all business transactions and payments, either received or made by ACTM in a transparent, accurate and complete manner in accordance with the applicable laws and accounting principles. You should ensure that the relationship with the business partner is documented by a written agreement which contains an anti-bribery and anti-corruption clause.

You should ensure that payments to and from the business partners of ACTM are only made in accordance with the contract and into agreed bank accounts. Cash payments should be avoided, unless there is a justifiable reason to pay in cash.

a. Suppliers

The main principles of this ABC Policy have also been incorporated in the Code of Conduct. Suppliers will seek to select their own suppliers in accordance with the ACTM Code of Conduct. You should ensure that the Code of Conduct forms part of the contractual relationship between ACTM and the supplier.

b. Agents

In many countries where ACTM operates it is impossible to conduct activities without a local partner or sponsor. Local contacts may be maintained by an agent, who also assists in the execution of projects. You should follow the internal procedure for contracting and dealing with agents.

Before you enter into a relationship with an agent, you must request an appointed legal advisor to perform a background check on the agent to establish that the agent has not shown any corruptive or other

unethical behavior. Only in the event that there are no relevant red flags, a relationship with this agent can be entered into.

You must use the mandatory standard template to contract with the agent. This standard contract specifically includes the principles from the ACTM Code of Conduct. The duration of a contract with an agent is limited to one year, unless there are justifiable reasons for a longer period. This requires the prior approval of the General Manager. Every extension of a contract requires another prior background check. The standard contract contains an ABC clause. Non-compliance may lead to termination of the contract with the agent without any further payment.

You should ensure that the fee for the services provided by the agent are reasonable and proportional.

ACCOUNTABILITY AND GOVERNANCE

The responsibility for the ABC Policy and the management of integrity risks sits ultimately with the General Manager.

Compliance of the ABC Policy is monitored by management and through audits performed by the external and internal auditors.

The General Manager reviews the content of the ABC Policy on a yearly basis.

HOW TO REPORT (SUSPECTED) MISCONDUCT

If you are an employee of ACTM and you believe that anyone who is involved in the business of ACTM is attempting to breach or has breached the ABC Policy, you are expected to report this to your (direct) manager or the General Manager.

WHERE DO YOU FIND THE ABC POLICY

The ABC Policy is available on ACTM intranet.

WHERE CAN YOU LEARN MORE ON THE ABC POLICY

You will receive on a regular basis an invite for an e-learning program about the ABC Policy to explain and train you how to use it. The e-learning is mandatory to follow and requires your sign-off to obtain a certificate of completion.

If you have any questions with regard to the ABC Policy, you may always contact the General Manager.

GENERAL DOCUMENT DATA

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