

ASENDIA GROUP ANTI-BRIBERY POLICY

Asendia has adopted an anti-bribery policy based on the legal principles against bribery adopted by different countries and international organizations all over the world. This anti-bribery policy is applicable to all the companies belonging to Asendia group, i.e. Asendia Holding AG and its subsidiaries (companies that are controlled at more than 50% by Asendia Holding AG), here-after called together “Asendia” or individually “Asendia” or “Asendia company”.

For reminder: Bribery consists in:

- The procurement or the promise of any illegal gift or advantage,
- For the “Improper performance” of its duties or activity by the beneficiary of the gift.
- In the view of obtaining or retaining business or a business advantage for the company at the origin of the gift.

Bribery may include Facilitation Payments, i.e. small bribes paid to facilitate routine Government actions. Bribery is an offense and may lead to severe sentences for the companies and the individuals involved.

Asendia is committed to prevent Bribery. Asendia Anti-Bribery policy is applicable to Asendia and its employees (including casual or temporary employees) and to Asendia’s suppliers, consultants, agents, distributors and commercial partners (“the Contractors”).

Asendia anti-bribery policy is based on the following principles:

“ASENDIA GROUP ANTI-BRIBERY PRINCIPLES”:

- 1** – Bribery is prohibited in the relationships with Asendia and with its employees. No active or passive bribery will be tolerated. This prohibition concerns both domestic and international business and the relationships with public officials and/or private persons, including intermediaries.
- 2** –Asendia has integrated its Asendia Anti-Bribery policy in its internal rules and in its purchase conditions. Asendia anti-bribery policy is publicly available on Asendia’s website (www.asendia.com).
- 3** – Any bribe attempt and any gift or advantage proposal will be reported immediately to the Head of Human Resources and to the CEO of the relevant Asendia company who will take appropriate measures.
- 4** - Facilitation payments are prohibited within Asendia. This does not concern fast-track procedures fees that are publicly available and are legally authorized according to the local law.
- 5** - Donations to Charities or other associations or foundations are subject to the prior assessment of the reputation of the potential recipient and will be approved only if the donation a) complies with local laws, b) may not alter Asendia’s image, c) does not exceed the thresholds authorized by Asendia internal rules (Asendia Business and Responsibility Regulations and other internal rules as applicable). No donation to any political party or connected association is authorized within Asendia.
- 6** - Corporate entertainments, gifts, hospitality and promotional expenditures by Asendia may only be authorized further to a prior assessment by the Head of Human Resources and by the CEO of the relevant Asendia company. Under no circumstance shall such kind of advantage be offered to public officials.

These kinds of gifts shall not be authorized if:

- they do not comply with local law,
- they are disproportionate with regard to the objective of general promotion of Asendia,
- they may create a conflict of interest with the recipient and/or his/her organization rules.

7 - Each Asendia company may determine in writing in its internal rules a threshold under which small gifts to the employees may be authorized in strict compliance with local law and standards. Under no circumstance should such kind of gifts be solicited.

8 - Asendia asks its Contractors to comply with Asendia Anti-Bribery Policy. Non-compliance may lead the relevant Asendia company not to enter into contractual relationship with the Contractor, or to terminate such relationship with immediate effect when the non-compliance is discovered, or to ask the Contractor to remedy the situation, depending on the gravity of the situation.

9 - Asendia will regularly assess the performance of its anti-bribery policy and will review it as necessary.