

Anti-Bribery, Lobbying & Corruption Policy

The Beuparc Group ("Beuparc") is committed to doing business lawfully, ethically and with integrity, no matter who we deal with or where we operate. This means that Beuparc will never tolerate instances of bribery and/corruption within our organisation and that, as an employee of Beuparc, you must never, directly or indirectly, engage in corrupt dealings with any other person or organisation.

Bribery is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. This could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered as part of a tender process.

All levels of management of this company shall:

- Undertake and review a risk assessment to ensure that controls remain proportionate and effective.
- Develop systems to ensure bribery risks are monitored.
- Train and communicate with personnel to ensure understanding of what constitutes bribery, its impact and what to do if they are put in a position where this may occur.
- Investigate any suspected claim of misconduct by personnel.
- Support personnel who raise concerns.
- Operate a zero-tolerance policy towards those who have been found to be acting contrary to this policy.

Beuparc shall endeavour at all times to act in a socially responsible manner, within the laws, customs and appropriate traditions of the countries in which we operate. The Group shall do what it can to contribute in a responsible manner to the development of communities.

Where differences exist between the standard of the law or regulations and the requirements of this Policy, the higher standard will be applied. Management with responsibility for operations are expected to ensure that our business processes are in compliance with the law.

Anti-bribery and anti-corruption laws vary from country to country. Nevertheless, we are expected to adhere strictly to relevant laws in relation to bribery and corruption including The Criminal Justice (Corruption Offences) Act 2018 in Ireland, USA Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act 2010, Articles 177 and 178 of the Dutch Criminal Code and all other applicable local laws.

While these laws are often fundamentally similar, their differences can be material. Therefore, great consideration should be given to consulting with your line manager, or Head of Legal to ensure compliance with all applicable laws.

Conflict of Interests

Beuparc requires all employees to avoid any conflict or appearance of conflict between their interests and those of Beuparc, and to disclose any actual or potential risk of conflicts.

The individual in doing so must:

- Specify the persons to whom the conflict of interest will be made known.
- Specify any activities, including discussions, negotiations, and decisions, in which the individual making the disclosure may not participate.
- Specify any positions which the individual making the disclosure may not occupy (whether temporarily or permanently).

Lobbying and Political Contributions

Beuparc does not make political donations or contributions, nor do we exercise involvement in political activities (monetary or otherwise). Beuparc is committed to conducting business with integrity. This policy outlines in writing the approach Beuparc utilises in relation to corporate political contributions.

Where employees or team members attend a political event in corporate benefit to Beuparc, provided it is lawful, approval must be sought from management before attending.

Participation by employees in political processes, activities and contributions are entirely personal and voluntary. Associations shall be engaged as private citizens and must make clear that views or opinions expressed are not that of Beuparc. Employees must not use their position in Beuparc to coerce or pressure other individuals to make contributions or support any political activities or opinions.

Lobbying activities shall encompass the following principles:

- Legitimacy - respect for public bodies should be maintained and matters lobbied should not be inconsistent with public interest.
- Transparency - open and truthful in their communications with their stakeholders. This shall be accomplished by ensuring accuracy of information through correct disclosure of activities and where appropriate, preserving confidentiality.
- Consistency - should practice what they preach and have regard for code of conduct.
- Accountability - should be accountable for their actions and act with integrity, individuals shall avoid improper influence in the course of activities and observe provisions in regulation.
- Opportunity - identify issues that further the public interest and are of common concern on which they can lobby together.

If for any reason you believe that this Policy is not being followed, the Board encourage anyone to speak up. Beuparc values employees who raise concerns in good faith and will not tolerate retaliation in line with the Whistle-Blowing Policy.

It is every employee's responsibility to know and adhere to this policy. Failure to meet the policy's requirements may become a disciplinary matter. In some instances, failure to follow this policy could lead to criminal prosecution, potentially resulting in attracting a criminal record, fines and/or custodial sentence.

Signed:



Chief Executive Officer

Date: 1st January 2024