

## Ethics & Anti-Corruption Policy

At **BeneluxSoft B.V.**, we are committed to conducting all our activities in an ethical, transparent and responsible manner. As a European technology company engaged in digital transformation, cybersecurity, AI innovation and EU-funded projects, we operate under strict principles to prevent corruption, fraud, conflicts of interest and unethical behaviour in all forms.

This policy is aligned with:

- **EU Anti-Fraud and Anti-Corruption Frameworks**
- **Horizon Europe Rules for Participation**
- **European Anti-Corruption Directives**
- **OECD Anti-Bribery Guidelines**
- **Belgian Criminal Code (anti-corruption provisions)**
- **EU Charter of Fundamental Rights**
- **Code of Conduct for EU-Funded Projects**

This page outlines the standards we apply to employees, contractors, suppliers and project partners.

### 1. Purpose of This Policy

The aim of this policy is to:

- Ensure ethical behaviour in all operations
- Prevent, detect and respond to fraud and corruption
- Protect the integrity of EU-funded projects and partnerships
- Promote transparency and trust with clients, partners and stakeholders
- Provide clear guidance on expected behaviour
- Support a zero-tolerance environment for misconduct

This policy applies to all BeneluxSoft staff, consultants, partners and subcontractors, regardless of location.

## 2. Our Core Ethical Principles

BeneluxSoft operates under the following foundational principles:

### **Integrity**

We act honestly, professionally and with respect for all individuals and organisations.

### **Transparency**

Decisions, collaborations and financial operations must be transparent, traceable and auditable.

### **Accountability**

We take responsibility for our actions and ensure that all team members maintain the highest ethical standards.

### **Fairness & Equality**

We treat all individuals fairly and promote equal opportunities without discrimination.

### **Zero Tolerance to Corruption**

Any form of bribery, kickback, extortion or fraudulent behaviour is strictly prohibited.

## 3. Zero-Tolerance Anti-Corruption Commitment

We prohibit, under all circumstances:

- Offering, giving, receiving or requesting bribes
- Kickbacks, facilitation payments or undisclosed commissions
- Gifts or hospitality intended to influence decisions
- Manipulation of procurement or selection processes
- Falsification of documents, signatures or certifications
- Fraudulent reporting in EU-funded projects

- Collusion with external parties to gain unfair advantage
- Misuse of public or project funds

Violations may lead to:

- Contract termination
- Internal disciplinary action
- Legal action under Belgian & EU law
- Reporting to relevant enforcement bodies

#### **4. Compliance with EU Anti-Fraud Rules (Especially for EU Projects)**

BeneluxSoft complies fully with the rules set by:

- European Anti-Fraud Office (OLAF)
- European Public Prosecutor's Office (EPPO)
- Horizon Europe Model Grant Agreement
- EU Financial Regulation (Regulation 2018/1046)

This includes:

- Accurate documentation of project costs
- Transparent subcontracting & procurement
- Avoidance of conflict of interest
- Timely reporting of risks or irregularities
- Cooperation during audits or investigations

We commit to maintaining high ethical standards in all EU project proposals, budgeting, execution and reporting.

#### **5. Gifts, Hospitality & Conflicts of Interest**

##### **Gifts & Hospitality**

BeneluxSoft employees may not give or accept gifts, entertainment or hospitality if:

- - They could influence decision-making
  - They exceed modest and reasonable value
  - They compromise impartiality
  - They violate local or EU rules

### **Conflicts of Interest**

A conflict of interest arises when personal interest clashes with professional duty.

Employees and partners must:

- - Declare any potential conflict
  - Remove themselves from affected decisions
  - Follow transparency and documentation procedures

Examples include:

- - Family or personal relationships influencing procurement
  - Side businesses competing with BeneluxSoft
  - Receiving undue benefits from suppliers

## **6. Ethical Behaviour in Procurement & Partner Selection**

BeneluxSoft follows fair and transparent procedures for:

- Supplier selection
- Subcontracting
- Hiring external experts

- Evaluating tenders

We ensure:

- Competitive and merit-based decision-making
- Clear documentation and justification
- Avoidance of undue influence
- Respect for equal opportunity principles
- Compliance with EU procurement rules for funded projects

## 7. Data Ethics & Responsible Use of Technology

As a company working with cloud, AI, automation and sensitive systems, we commit to:

- Protecting privacy and fundamental rights
- Ensuring transparency in AI usage
- Avoiding harmful or discriminatory algorithms
- Preventing misuse of data and digital tools
- Conducting technology assessments ethically

We do not engage in:

- Surveillance without legal basis
- Data harvesting for illicit purposes
- Misleading or manipulative use of AI systems

All processing follows GDPR, ISO 27001 and EU AI ethics principles.

## 8. Anti-Harassment & Professional Conduct

We maintain a professional working environment free from:

- Harassment
- Bullying

- Discrimination
- Abuse of power
- Threatening or hostile behaviour

BeneluxSoft supports open communication, mutual respect and diversity.

## 9. Reporting Misconduct (Whistleblowing)

We strongly encourage responsible reporting of:

- Fraud
- Corruption
- Harassment
- Regulatory non-compliance
- Security breaches
- Misuse of project funds
- Conflicts of interest

### Reporting channels:

- [erhan.akkilik@beneluxsoft.com](mailto:erhan.akkilik@beneluxsoft.com) (for security-related issues)
- Direct manager or internal contact point
- Anonymous reporting (if requested)

Whistleblowers are protected from retaliation, in accordance with EU Directive (EU) 2019/1937 on whistleblower protection.

## 10. Investigation & Corrective Measures

Upon receiving a report, BeneluxSoft will:

- Review allegations confidentially
- Conduct impartial investigations

- Document evidence
- Take corrective or disciplinary actions
- Notify authorities if legally required
- Adjust internal processes to prevent recurrence

We cooperate fully with external auditors, EU authorities and legal bodies.

## 11. Training & Awareness

BeneluxSoft provides internal training and guidance on:

Ethical behaviour

- Anti-corruption obligations
- EU-funded project rules
- Conflicts of interest
- Information security
- Responsible technology use

Training is required for employees working on EU-funded projects, procurement, security or financial operations.

## 12. Policy Review & Updates

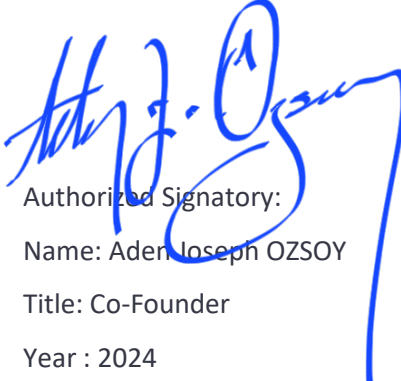
This policy is reviewed regularly to ensure alignment with:

- EU regulations
- New project requirements
- Organisational changes
- Evolving best practices

Updates will be published on this page.

### 13. Contact Information

For any security-related questions or concerns, please contact us at: <https://beneluxsoft.com/contact/>



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Year : 2024