

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:

- arif.aygun@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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