



ANTI-CORRUPTION GUIDELINE

"Only a corruption-free system makes it possible for all participants to compete on a level playing field."

(ICC Rules on Combating Corruption, 2011 edition)

BOI - YOU CAN TRUST US!

Fair competition is the basis of our economic activities at BOI. Corruption is contrary to our opinion and to all the values our company stands for. We aim to lead our company in a just, moral and transparent way.

Our customer's trust and our reputation are very important to us. Corruption would destroy our reputation and the trusting relationship with our customers and suppliers. To maintain this trust and preserve our reputation, strict compliance with all laws and regulations against corruption is necessary. In addition, we are committed to a clear anti-corruption policy.

What is corruption?

According to the definition of Transparency International (http://www.ti-austria.at) corruption is the "abuse of entrusted power for private gain". This includes

- active or passive corruption
- · venality in politics
- attempt to obtain benefits by bribes

Benefits or advantages may be:

- favoritism in procurement or other preferential treatment
- active or passive corruption
- Generous gifts, money ...

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Our anti-corruption policy

Our anti-corruption policy is based on the ICC code of conduct for businesses. Consequently, all employees including internal company management must behave that "no personal dependencies or obligations arise" ("Korruption bekämpfen, Ein ICC-Verhaltenskodex für die Wirtschaft", ICC Germany and DIHK, 2008).

- Offering and accepting any bribes is prohibited.
- A clear separation between business and private life is required to avoid conflicts of interest.
- Every relationship with public officials, private individuals or companies must be open and transparent and take place in a legitimate framework.
- BOI contracts contain anti-corruption clauses by default.
- Account books and other business documents have to be kept properly and transparently.
- All employees must report any suspicion of corruption. The management ensures that these reports are taken very seriously and investigated immediately.
- In case employees refuse the acceptance or payment of a bribe, they will not suffer any adverse consequences for this, even if the refusal leads to any business disadvantages for BOI GmbH.

Sanctions

Each employee is responsible to comply with applicable laws and with this guideline. The management of BOI provides the necessary framework for this. BOI management will sanction any violation of laws or of this guideline with disciplinary action.

BOI also expects compliance with all anti-corruption laws from suppliers and customers. In case business partners violate this guideline, BOI management reserves the right to legally terminate the business relationship.

Conclusion

We see our anti-corruption policy as our contribution to a functioning society and economy.

"Corruption not only causes financial damage, but it also undermines the foundations of society."

(<u>https://www.transparency.de</u>)

