

Anti-bribery and anti-corruption policy



Ekopak
∞ Ekopak Sustainable Water

Together towards
a sustainable future.

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1 Policy approval

This policy has been approved by the Management Team of the company on 27 Jan 2026.

2 Statement of principles

At Ekopak NV, trust and integrity are essential to achieving our vision and maintaining our reputation as a provider of high-quality, sustainable water solutions. Our commitment to ethical conduct is rooted in our core values (respect, integrity, collaboration, excellence, and sustainability) and is outlined in our Code of Conduct.

We uphold a strict zero-tolerance policy towards bribery and corruption, applying to all employees, contractors, suppliers, and other stakeholders. This policy promotes ethical behavior, transparency, and responsible business practices.

To support this commitment, Ekopak is guided by the following key principles:

- Bribes are never offered, accepted, or tolerated, regardless of the intention to secure contracts, gain business advantages, or influence decisions.
- Financial or other benefits from suppliers, partners, or third parties must not be accepted if they compromise, or even appear to compromise, our objectivity or independence.
- Any suggestion or impression that bribery is acceptable within Ekopak is strictly prohibited.
- No exceptions will be made, even in response to local customs, external pressure, or competitive challenges.

Ekopak recognizes that corruption harms both society and the economy, undermining fair competition, damages public trust, and poses serious legal and reputational risks. Ekopak aims to prevent such risks through clear policies, training, and confidential reporting mechanisms.

The following areas are of particular importance:

1. Political Contributions

Ekopak strictly prohibits any financial or in-kind donations to political parties, individual politicians, or affiliated organizations, in line with Belgian legislation that forbids such contributions by legal entities.

Employees, partners, and representatives may not use company resources (e.g. time, funds, materials, or communication tools) to support political activities. Any political contributions made in a personal capacity are the sole responsibility of the individual and must not be reimbursed or linked in any way to Ekopak.

2. Charities

While Ekopak actively supports charitable initiatives that align with its mission, all donations and sponsorships must be subject to thorough due diligence. Contributions must be transparent, legally compliant, and free from any intention to influence business decisions or gain unfair advantage. Employees must ensure that such support does not create a conflict of interest or serve as a disguise for bribery.

3. **Gifts and Hospitality**

Ekopak acknowledges that modest gifts and hospitality can play a role in building professional relationships. However, strict rules apply:

- They must never be offered or accepted to influence a business decision or gain an improper benefit.
- All exchanges must remain reasonable, proportionate, and aligned with standard business etiquette.
- Any gifts or hospitality that could be seen as excessive or inappropriate must be declined or reported through internal channels.

4. **Facilitation Payments**

Ekopak prohibits facilitation payments under all circumstances. These are typically small payments requested by officials to expedite routine administrative tasks that should be performed without payment. Employees must avoid and immediately report any situation where such a payment is requested, as these undermine ethical standards and can lead to serious legal risks.

5. **Providing free services or services at a strongly reduced price**

Employees and representatives must not offer services free of charge or at significantly reduced rates in exchange for favorable treatment or to influence decision-making. Any arrangement that could be perceived as offering an improper advantage, particularly to individuals in a position to award contracts or provide benefits, is strictly forbidden.

6. **Hiring Practices**

Ekopak will not use employment opportunities (including internships or temporary roles) to gain or retain business or secure any improper advantage. Specifically, no employment may be offered to:

- Current or prospective clients;
- Government officials or public employees;
- Individuals closely connected to the above;
- Candidates recommended with the expectation of special treatment.

7. **Employee Responsibility**

Every employee at Ekopak shares the responsibility of maintaining our high ethical standards. By working together, we ensure that our business is conducted ethically, transparently, and in full alignment with the core values that define Ekopak. We expect all staff to:

- Understand and follow the Ekopak's anti-corruption policy;
- Adhere to all relevant laws and internal procedures;
- Promptly report any concerns, suspicions, or violations.

3 Governance

Ekopak will regularly review and update this policy to ensure that we follow all applicable laws and regulations, and to reflect best practices in anti-corruption principles.

The Ekopak Group Management Team (MT) is responsible for overseeing this policy, thereby assisted by several departments, such as Finance, Legal, HR and Procurement. Reporting is done to the Board of Directors, at least annually.

4 Scope

The Anti-corruption policy of Ekopak applies to all of our operations and to all full-time, part-time, and temporary colleagues who are directly employed by Ekopak, including our directors and management. The policy also extends to any subsidiaries or joint ventures where Ekopak has a majority interest or management control.

5 Implementation

Every incident regarding bribery and corruption must be investigated. Depending on the outcome of an investigation, mitigation measures are put in place.

Equally important is to develop and adopt adequate internal controls and measures to monitor the prevention and detection of bribery and corruption.

6 Reporting misconduct

Despite our commitments on ethical behavior, conduct that seems to violate this policy or applicable laws and regulations can and should always be reported.

By speaking up, you give Ekopak the opportunity to review and act on the issue. We believe that speaking up is key to sustaining our reputation, success and license to operate. We greatly value the help of employees and others who identify and speak up about potential concerns that need to be addressed. People who speak up are protected and will not suffer for raising concerns in good faith about suspected misconduct. Ekopak will not tolerate any form of retaliation against you for speaking up.

You may use the Whistleblowing mailbox report@4legal.be to raise concerns confidentially or anonymously and in your own language.

For more information or questions, please contact the Group HR Department:
HR@ekopakwater.com.