

ANTI-FRAUD AND ANTI-CORRUPTION POLICY **OF TRANSFOND S.A.**

1. GENERAL CONSIDERATIONS

Compliance with all the applicable laws and regulations, including legal provisions related to fight against corruption, long with compliance with the highest professional, moral and ethical standards, represent an essential value for TRANSFOND. All employees must be aware of and comply with the rule and the spirit of these regulations and standards.

TRANSFOND undertakes to observe the law and the highest ethical standards and not to tolerate any form of corruption. We expect that TRANSFOND employees act at any moment in accordance with the law and the generally accepted ethical and moral standards.

2. SCOPE

The anti-corruption policy shall apply to all TRANSFOND employees, as well as to third parties representing TRANSFOND or acting on behalf of TRANSFOND, regardless of their quality: clients, suppliers or business partners. This means that any person working for the account of or on behalf of TRANSFOND, must not require, receive or offer any bribery.

3. CORRUPTION

In the sense of this policy, the "*corruption*" notion aims at the facts described by Title V – *Offenses of corruption and misfeasance in office*" of the *Criminal Code*, those described by *Law no.78/2000 concerning the prevention, finding and sanctioning of the corruption actions*, as well as any other corruption actions, described as such in special criminal or non-criminal laws containing criminal provisions. The provisions of *Law no.78/2000* are applied to persons fulfilling, permanently or temporarily, according to the law, a position or a task, to the extent to which they take part in the decision-making process or they can influence it, within the public services, autonomous administrations, trading companies, national companies, cooperative units or other economic operators.

Without being an exhaustive enumeration, according to the Criminal Code the main facts and practices considered corruption actions are the following:

- Bribery and corrupt practices (promise, offering or giving, as well as requesting or receiving money or other undeserved goods, directly or indirectly, for oneself or for others, in relation to the fulfilment, non-fulfilment, expediting or delay in the fulfilment of an action that falls within the job description or in relation to the fulfilment of an action contrary to this job description);
- The influence peddling and purchase of influence (requesting, receiving or accepting the promise, as well as promising, offering or giving money or other undeserved goods,

directly or indirectly, for oneself or for others, to a person that has influence or gives the impression that has influence over a public servant, for determining her/him to fulfil, not fulfil, expedite or delay the fulfilment of an act falling within its job description or fulfil an action contrary to this job description).

The advantages can be financial or non-financial and may include:

- money;
- loans (under advantageous or preferential conditions);
- donations (including charitable donations);
- employment contracts;
- consultancy contracts;
- preferential treatment;
- confidential information;
- gifts and hospitality;
- holiday trips;
- any other advantage or benefit having a patrimonial value or which is perceived as presenting a value for the beneficiary or for another person (for instance a relative or a friend of the beneficiary).

There are no differences between bribery and facilitating an activity, which is prohibited as well

The facilitation of an activity is constituted by a small amount offered to a low-level public servant, in order to facilitate or expedite an activity, which constitutes her/his professional obligation.

The bribery attempts can be committed both **in the private sector as well as in the public sector**.

TRANSFOND prohibits the bribery/corrupt practices and the facilitation of an activity.

4. GIFTS AND HOSPITALITY

Offering and receiving gifts, additional income, entertainment elements or other articles with monetary value exceeding a symbolic or conventional value is prohibited. In addition, the gifts with a conventional value are allowed only if they are received occasionally and in adequate circumstances for the offering of gifts and do not have as purpose obtaining or maintaining a business or turning it into an advantageous one.

5. REPORTING THE SUSPECTED BRIBERY CASES

Any presumed or actual violations of this policy must be reported immediately to the executive management of TRANSFOND. These reports shall be investigated in a confidential manner. The person reporting ("the integrity whistle-blower") as well as the person investigating such reports cannot be subject to the sanctions for the notification/investigation of deviations from this Policy.