

# ANTI-CORRUPTION POLICY

Mouscron, 25.02.2015

This declaration fit into an ongoing process method
Its implementation will be gradual and will take account of our market realities, our networks, our skills and our management methods.

## **PRESUPPOSITIONS**

The purpose of this Policy is to fight against corruption (called after "Policy"). This policy aim for ensuring compliance with applicable international laws against corruption by Wollux SA (called after "Wollux") and its subsidiaries ("WoPrint", "W-Digital", "W-Sales", "Wollux Immobilière", "Immo Holding", "Wollux Diffusion", "Wollux Finances" and "Wollux Nederland").

This Policy need to follow European and Belgium laws and punish each illegal act of corruption in Wollux.

All members of Wollux are required to conduct their activities ethically and abiding. The use of funds for purposes illegal, abusive purposes is prohibited. All gifts and illegal payments could also affect the growth of the company.

Wollux relies on its subsidiaries to adopt policies and procedures that inform their employees about applicable local laws related to the fight against corruption.

This Policy applies to all domestic and international operations of Wollux, including operations by division, department, agent or consultant.

## **DESCRIPTION OF THE POLICY**

Wollux expects each of its officers and employees that it reflects, by its conduct, Wollux commitment to comply scrupulously with the wrestling rules against corruption.

## 1. Ethics

Wollux is committed to conducting its business in legality, integrity and transparency, and does not tolerate any form of corruption. The fight against corruption is an essential part of this commitment. This policy is intended to explain the rules to comply with the laws and regulations applicable in the fight against corruption.

## 2. Objective

This policy aims to guide all employees and managers Wollux in their daily activities, by providing them with practical knowledge, and explaining how to act in accordance with the rules of fight against corruption, through a presentation of the most important rules.

## 3. Fields of application

This policy applies to employees and officers of Wollux, whatever the activity, the country or the post occupied level, which are directly or indirectly involved in activities at risk of corruption. It also applies to all third parties acting with or on behalf of Wollux.

### 4. Human Resources

Each employee is required to read the content of this policy and to carry out its mission in accordance with the principles set out therein. Any violation of this policy may result in disciplinary action up to a breach of the employment contract.

## 5. Communication

Each subsidiary, site, or branch must ensure that its employees are aware of this policy by using the most appropriate means. Wollux must also ensure that its trading partners are aware of this policy.

## 6. Education

This policy is part of a compliance program dedicated to the fight against corruption. It will be completed and illustrated with training delivered through seminars and online courses. The records of the training programs will be retained by the Legal Service. This training program will enable participants to identify and manage operational risks that corruption poses to Wollux.

#### 7. Inspection report

Compliance audits covering the implementation and deployment of the program to fight against corruption in a given period will be planned to assess whether the policy is correctly applied. If necessary, corrective actions will be made. Wollux hope that, by its conduct, each employee will attest to the importance of the fight against corruption for the Group.

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