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# Corporate Compliance Policy

Corporate compliance policy of Madaster Services B.V.

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# Information

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## **Context of this document**

This document contains the corporate compliance policy of MdS Services B.V.. Corporate compliance refers to the lawful and proper conduct of the company's business.

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# 1 Corporate compliance

Madaster Services B.V. (MdS) is esteemed as a company with distinct strengths. While this reputation is not built over years, the careless, improper actions of just one employee can damage our image in the blink of an eye. We must prevent this. To do so requires that all employees be guided in their activities by reasoned principles, particularly those set forth in this Corporate Compliance Policy. Remember that the way each employee conducts the company's business can affect MdS's public image.

## 1.1 Introduction

Corporate compliance refers to the lawful and proper conduct of the company's business. Each employee is obligated to obey all applicable laws and corporate guidelines in his or her work for MdS. The Corporate Compliance Policy serves as the basis for this. It does not, however, cover all conceivable situations or describe all of the particular rules that must be followed. Furthermore, the law in some countries may prescribe stricter standards than those set forth here, in which case the stricter standards govern.

Unlawful and unethical behavior can have far-reaching consequences for the company, including:

- criminal penalties;
- administrative fines;
- civil and punitive damages;
- seizure of profits;
- exclusion from contracts;
- termination of business relationships;
- attempted extortion;
- harm to our image.

Individual employees who violate the principles of this Corporate Compliance Policy also face serious consequences, such as fines or imprisonment, claims for damages, sanctions under labor law and possible termination of employment.

Employees who disobey the rules cannot claim to have been acting in MdS's interests, because any compliance violation ultimately harms the company. In view of the possible consequences, any advantage somebody purports to have gained in a specific situation can never, not even economically, be advantageous to the company as a whole.

MdS desires to succeed in the competitive arena by being innovative, quality-driven, reliable and fair. If the only way to close a deal is by acting in a way that is illegal or unethical, we will forego the deal. An employee who declines business in such circumstances will never suffer retaliation as a result.

We are continuously in the public eye. By systematically implementing this Corporate Compliance Policy, we show the media, our investors, competitors, the authorities and our business partners that compliance is an integral part of our corporate culture.

MdS aims to be a globally active company. Our employees, therefore, are potentially exposed to a wide variety of norms and ethical principles, some of which are often unfamiliar to them. What at first sight appears to be a purely local matter may also be subject to the laws of a foreign jurisdiction. This Corporate Compliance Policy is intended to give employees a point of reference in their daily work and thereby help them avoid violations. By definition, its focus is limited to areas of particular practical significance. However, it should also encourage employees to familiarize themselves with the rules that affect them and to seek counsel in case of doubt. Ignorance is no defense against the potential consequences of breaking the rules. For support, employees can turn to their supervisors. Employees should especially avail themselves of these resources when others may be harmed, they themselves are in danger, a high degree of risk is involved or the legal situation is unclear.

## 1.2 Code of conduct

MdS employees act professionally during our business conduct. To make this professional behavior more explicit, we have defined the MdS code of conduct:

- We operate according to all applicable laws, contractual requirements and regulations.
- We are committed to fair business practices and respect our competitors.
- Our personal relationships and activities do not comprise MdS's objectivity or reputation.
- We act with honesty and fairness in our work for our clients.
- We do not accept or give questionable payments or gifts of hospitality.
- We communicate and act in a transparent manner to foster trust and minimize ambiguity.
- We promote a safe and healthy work environment mindful of work/life balance goals.
- We handle all our colleagues with fairness, courtesy and respect.
- We do not tolerate harassment or intimidation.
- We respect differing beliefs and personal values of colleagues and clients.
- We acknowledge and respect the impact we have on the world around us.

The below paragraphs provide a more detailed description context to further guide MdS employees.

## 1.3 Corruption

Corruption is contrary to fair competition and harms the company's economic standing and reputation. In addition, many countries treat corruption as a crime, regardless of whether the actual act takes place in their jurisdiction or in another country.

Thus, MdS's employees are strictly prohibited from attempting to unlawfully influence business partners, whether through favors, gifts or the granting of other advantages, anywhere in the world. This rule particularly applies to dealings with individuals acting on behalf of government agencies or other public institutions.

MdS will not entertain any business deals that involve breaking the law or violating company rules relating to the granting or acceptance of favors, mindful of the fact that some business may be lost as a result. No amount of potential additional revenues or earnings can justify illegal business practices. No employee, regardless of the country in which he or she works, is entitled to violate the law or company policy.

Any gift, even those given indirectly (for example to friends, relatives or associations), is considered an advantage. Examples include: cash, invitations to events, airline tickets, hotel stays, employment for friends or relatives, special personal favors and even the provision of expensive food and drink.

MdS employees are not allowed, under any circumstances, to demand personal gifts. Likewise, they may not offer or grant gifts of cash, or gifts equivalent to cash, to any public official.

In dealings with business partners, employees must avoid granting or accepting any gifts in connection with the negotiation, award or performance of a contract, and any gift granted or accepted must be of a size deemed unobjectionable under the laws applicable to both the giver and the recipient. In case of doubt, please contact your supervisor.

## 1.4 Fair and respectful working conditions – no discrimination

No person is to be unfairly treated, disadvantaged, favored, harassed or ostracized because of race or ethnicity, color, nationality, religion, ideology, gender, age, physical characteristics, appearance or sexual orientation or other protected classes in the particular country.

Everyone has the right to be protected against discrimination and harassment of any kind whether within MdS or in their contacts with outside parties.

MdS expects its employees to be friendly, objective, fair and respectful in their dealings with colleagues and third parties, including customers, suppliers and officials. By doing so, they also make an active contribution toward protecting MdS's good reputation.

The responsibility for maintaining these standards of conduct rests with each and every employee, not just with supervisors. A violation of these standards will not be tolerated. Any conflicts should be referred to the employee's supervisor, who, if necessary, will take the required action to appropriately address any wrongdoing and to prevent a repeat violation.

## 1.5 Cooperate with authorities – no misinformation

The company endeavors to be cooperative in its dealings with all authorities and government agencies while at the same time defending its own interests and rights.

All employees responsible for collecting company information and communicating it to securities market authorities, to other regulatory authorities or for other public announcements should communicate such information completely, openly, correctly, timely and understandably.

The responsible persons must be notified immediately when employees are contacted by any authority, such as the police or public prosecutor's office, whose job it is to investigate possible legal violations or prosecute violators. In particular, information or documents should be provided only after consulting and with the assistance of the responsible person.

## 1.6 Practical matters

### 1.6.1 Confidential treatment of knowledge and information

MdS can be trusted when dealing with the client's sensitive and confidential information. Moreover, we handle secret and inside information appropriately and lawfully.

- We protect the privacy of personal information and comply with data privacy laws.
- We actively secure and protect all data we have available as a result of our business activities.
- We explicitly manage the security of our electronic communication and storage devices.
- We protect confidential and proprietary information in public areas by avoiding open discussion and limiting communication through electronic devices.
- When employees deal with information of which they know it should be classified as confidential or market sensitive, they will handle this with the necessary care.
- Employees that possess confidential or market sensitive information will not share this with third parties, unless the standard performance of their duties or function so requires, only on a need-to-know basis.
- If confidential or market-sensitive information is shared, employees make the recipient aware of its delicate nature.

### 1.6.2 Internet, E-mail and Text messaging

MdS employees are expected to behave in a proper manner and maintain a professional attitude in their activities involving e-mail, the Internet, text messaging and other electronic systems. This expectation also extends to the use of systems at client facilities or systems to which the client has granted access. If an employee fails to comply with these rules, MdS may take measures which vary from withdrawing the employee's access to the Internet and other electronic systems, seizing the employee's mobile telephone or may even lead to the employee's immediate dismissal.

The following are prohibited:

- Downloading or forwarding and/or possessing illegal, obscene, pornographic, discriminating, sexually implicit or other inappropriate materials.
- Sending threatening, defamatory, offensive or other inappropriate messages.

- Sending or participating in chain letters/e-mails. To qualify as such, these letters must a) encourage the employee to send information to others b) be non-work related.
- Sending documents that are the property of MdS (such as client information) or other confidential information concerning clients or suppliers.

The points above also apply to voice communication, including text messages.

### 1.6.3 Social media etiquette

As social media platforms such as LinkedIn, Facebook and Twitter gain traction among business circles, it is important for all MdS employees to maintain a professional image across these platforms in interactions which are business-related.

Given below are a set of guidelines aimed to assist the employee in making decisions while interacting with work-related persons i.e. clients and colleagues on social media and personal messaging platforms:

- Be mindful of what you say and how you articulate yourself. It is easy to respond without thinking on instant-messaging and social media platforms. However, you have to be careful about what you say, especially if it pertains to any business or client information of MdS.
- When deciding whether to share personal details on platforms like Twitter or Facebook, follow the “bulletin board rule”. If you are not confident that the information you are going to share will look appropriate on an office bulletin board, then refrain from posting it on a social media platform too.
- Under no circumstances are you to publish or share any materials that are sexually explicit in nature or contain vital information pertaining to MdS projects.
- As far as possible, avoid any important business communication on social media and instant-messaging platforms. Stick to conventional forms of communication like emails, which also make it easier to track back information at a later date.

## 2 How does this policy affect the daily work routine?

All MdS employees must adhere to this Corporate Compliance Policy. It is intended to protect both the company and its employees.

This policy defines the framework within which MdS employees can act with confidence and directly benefits them by, among other things, safeguarding the employees from discrimination and establishing rules for occupational safety. Its observance therefore is in the best interest of employees both as individuals and as important contributors to MdS's success as a whole – success from which employees benefit.

Every employee is called upon to review his or her own behaviour in light of the standards set forth in this Corporate Compliance Policy and to ensure that these standards are observed. Compliance is factored into each employee's performance review as a matter of course.

Employees should bear in mind that there are specific laws and internal guidelines that address in greater detail the topics discussed here. Employees are required to familiarize themselves with the applicable laws and internal rules governing their areas of responsibility and to follow these laws and rules in their daily work. Any ambiguities should be clarified. The company provides its employees with access to all the necessary information resources and counsel to prevent violations of the law or company regulations. The provisions of this Corporate Compliance Policy take precedence over any conflicting instructions given by a supervisor.

Every supervisor must organize his or her area of responsibility so as to ensure adherence to this Corporate Compliance Policy and applicable law. In particular, supervisors must communicate the rules applicable in their areas of responsibility, monitor adherence to them and enforce them. Problems must be actively addressed and resolved.

Each supervisor is expected to set an example for his or her area of responsibility by acting with integrity and thereby ensure that compliance is internalized as a fundamental part of our corporate culture.

The company also offers ways of reporting suspected compliance violations anonymously, for example via a telephone hotline.

The company will ensure that no employee is in any way disadvantaged because he or she, acting in good faith, reports a possible compliance violation. When the reporting employee is himself/herself involved in a violation of this Corporate Compliance Policy, the company, in determining any action to be taken against that employee, will consider whether or not the report and any timely assistance given in investigating the possible violation helped avert further damage to the company.

Violations of this Corporate Compliance Policy should be reported to the responsible supervisor.

When employees suspect corruption or the intentional mishandling of company property or finances, for example, embezzlement, fraud, breach of trust or the offering or acceptance of bribes, they should report the matter without delay directly to their supervisor.

Promptly reporting this kind of information is likely to save the company from suffering additional, more serious harm or at least mitigate the damage. For this reason employees should direct this kind of information to the individuals and departments mentioned above, because they are most capable of taking the necessary legal steps.



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