



CRIMINAL COMPLIANCE POLICY



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1 Target

This Criminal Compliance Policy develops the provisions of the Code of Ethics of F. Initiatives, Société Privée à Responsabilité Limitée (hereinafter "FI BELGIUM") and, consequently, is linked to the values and rules of conduct described therein, ratifying its commitment to a way of acting based on compliance not only with the applicable legal system, but also with the ethical values and rules of conduct, imposed internally on a voluntary basis by the organisation and set out in its Code of Ethics.

This Policy is aligned with FI BELGIUM's strategic objectives, and with its determination not to tolerate, detect and mitigate non-compliance with laws and regulations, in particular those of a criminal nature. FI BELGIUM's Compliance Policy takes into consideration not only the aims of the organisation, but also the requirements that may come from its stakeholders.

Through this Criminal Compliance Policy, the Governing Body demonstrates its leadership in internalising in the people affected by this Policy the commitment to comply with the rules of conduct established in the Compliance Management System.


2 Persons, entities and activities subject

2.1 Persons and entities subject

This Policy is mandatory and applies to all members of FI BELGIUM, who shall comply with its contents, regardless of their position. This Policy shall be extended, in whole or in part, to Business Partners, whenever circumstances make it possible, in compliance with the due diligence processes relating to Business Partners.

2.2 Subject activities

The identification of the activities in whose scope the offences for which legal persons may be investigated in Belgium may be committed is set out in the document "Criminal Risk Analysis", in which, among other aspects, together with the description of each of these criminal offences, the possible risk scenarios in FI BELGIUM are detailed, in accordance with the characteristics of its activity, its context and the needs and expectations of its stakeholders. These scenarios are

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given by way of example and do not constitute a closed list, as there may be other ways of committing the criminal offences referred to.

Criminal Compliance decisions at FI BELGIUM are based on risk analysis and assessment, according to a methodology previously defined in the document "Criminal Risk Analysis and Assessment Methodology". Once the risk has been assessed, measures will be taken to minimise the organisation's exposure to criminal risks.


3 Principles of behaviour underpinning the Criminal Compliance Policy

The Criminal Compliance Policy must be based on principles of behaviour for the persons and entities subject to this Policy. FI BELGIUM does not allow, nor does it consent in any way or under any circumstances, that the persons and entities subject to this Policy carry out criminal acts or operations, nor that they participate in actions or operations of an illegal nature, nor that they seek to obtain a personal benefit or to favour any interest that they presume to belong to the Organisation.

4 Compliance objectives

FI BELGIUM has established Criminal Compliance objectives that are consistent with the provisions of this Policy and the results of the identification and assessment of criminal risks. These Compliance objectives are not limited to a statement of intent, but are measurable, take into account the requirements imposed by applicable criminal law and FI BELGIUM's Compliance Management System, are monitored, communicated and updated as appropriate. FI BELGIUM's Compliance objectives are as follows:

1. Prevent all types of conduct that may constitute bribery and corruption and that may affect the rules of fair competition in the market.
2. Prevent all types of conduct that may affect Intellectual and Industrial Property and the rules of fair competition in the market.
3. Ensure transparency in the way we communicate with our customers and potential customers.
4. Prevent any type of conduct contrary to compliance with our labour, tax and fiscal obligations.
5. Internalise a culture of criminal compliance.

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5 Declaration of compliance

Compliance with the principles and requirements set out in this Policy is often a legal obligation or a standard, and all staff are expected to be aware of and respect the contents of this Policy.

The Compliance Body will be responsible for the implementation and compliance with this policy, as well as for its periodic review and for promoting actions for its adequate dissemination and compliance, ensuring that all persons involved in the tax practice have sufficient technical training commensurate with their level of responsibility.

Should any FI BELGIUM employee have any queries regarding compliance with this policy in relation to any particular situation they may find themselves in, they may direct them to the following email address comite.eticoES@fi-group.com, which will be dealt with by the Company's Ethics Committee.

Likewise, a whistle-blowing channel has been set up through which to inform the Ethics Committee of any breach of this Policy that may give rise to the commission of offences and infringements, which is available on the company's website.

FI BELGIUM will respond immediately to any breaches of the provisions of this Policy, within the parameters set out in current legislation and internal disciplinary procedures.

6 Approval and dissemination

The Management Body shall provide appropriate means for the dissemination, training and enforcement of this policy at FI BELGIUM.