

# ANTI-BRIBERY POLICY

SAELENS INTERTRANSPORT NV (Sitra NV), part of the Sitra Group



## 1. INTRODUCTION

---

The Sitra-group is an international transporter of goods, specialized in the transport and logistics of food products in all of their forms. From local artisans to international multinationals, the Sitra-group offers the best formulas available for every branch of the food sector. In order to continue to grow and to guarantee its position as a reliable partner, Sitra develops various policies that make it possible to maintain this position. It is in this context that this policy is being written. Corruption and bribery do not fit in with the values that a family business like Sitra is strongly committed to.

Through this policy, the Sitra Group wishes to indicate that there is no place for bribery within the company and anyone associated with the company. Bribery is a crime that is prohibited by both international and national legislation. The Sitra-group respects this legislation.

## 2. SCOPE

---

This policy applies to every entity of the Sitra group. This means that within these entities the policy applies to the following persons:

- Board members
- All employees working in the branches of the group. This includes persons employed on a contractual basis, but also those who offer their services on a self-employed basis.

In addition, the Sitra Group expects every customer, supplier or anyone who may be associated with Sitra to respect the regulations on bribery and corruption. The rules contained in this policy are the minimum that must also be respected by them.

## 3. THE PROHIBITION OF BRIBERY

---

### 3.1 Definitions

Bribery takes many forms. In order to make clear what is meant by bribery here, it is necessary to define the scope of the term. The scope of bribery is broad.

What is considered as bribery for the Sitra group is defined in the Belgian Criminal Code. The Belgian Criminal Code distinguishes the following types of bribery:

**Passive private bribery:** consists in the fact that a person who is a director or manager of a legal entity, agent or nominee of a legal entity or a natural person, directly or through intermediaries, for himself or for a third party, requests, accepts or receives an offer, a promise or an advantage of any kind, in order to perform or refrain from performing an act of his function or an act facilitated by his function, without the knowledge and without the authorisation of, as the case may be, the board of directors or the general meeting, the principal or the employer. (art. 504bis §1 Belgian Criminal Code)

**Active private bribery:** consists of the direct or indirect introduction to a person who is a director or manager of a legal person, agent or nominee of a legal person or a natural person, of an offer, promise or advantage of any kind, for himself or for a third party, to perform or refrain from performing an act of his office or an act facilitated by his office, without the knowledge and without the authorisation of the board of directors or the general meeting, the principal or the employer, as the case may be. (art. 504bis §2 Belgian Criminal Code)

**Passive (public) bribery:** consists in the fact that a person exercising public office requests, accepts or receives, directly or through intermediaries, for himself or for a third party, an offer, a promise or an advantage of any kind to engage in one of the behaviours referred to in Article 247.<sup>1</sup> (Art. 246 §1 Belgian Criminal Code)

**Active (public) bribery:** consists in the direct or through intermediaries of an offer, a promise or an advantage of any kind whatsoever, to a person exercising public functions, for himself or for a third party, in order to engage in one of the behaviours referred to in Article 247. (Art. 246 §2 Belgian Criminal Code)

Any person who has put himself forward as a candidate for such office, who gives the impression that he will hold such office or who, by the use of false attributes, gives the impression that he will hold such office, shall be treated as a person holding public office within the meaning of this Article.

**Corruption:** Corruption occurs when bribes are made to persons in a position of power. Sitra has a strict policy on all types of bribery, so corruption, like all other types of bribery, will be covered in the remainder of this policy.

---

<sup>1</sup> Art 247 Belgian Criminal Code, [LOI - WET \(fgov.be\)](#)

## 3.2 Principles of the prohibition of Bribery

Sitra confirms through this policy that it prohibits any form of bribery as defined in this policy. It is important to note that this applies not only to directors and employees of the Sitra group but also to every person who provides services on an independent basis, customers, suppliers or anyone who is linked to Sitra in some way.

In particular, each of these persons is prohibited from:

- Offering, promising or giving a bribe.
- Requesting, agreeing or accepting a bribe.
- Bribing a foreign official to obtain or retain business or benefits.
- Not prevent a third party from engaging in bribery on behalf of Sitra.

Sitra applies zero tolerance in this regard. It will take the risk of bribery into account when considering or accepting its customers and suppliers.

Sitra will retain the right to verify with its customers or suppliers whether they comply with the terms of this policy. If this proves not to be the case, Sitra will consider this is as a serious breach.

## 3.3 Measures to prevent bribery

### 3.3.1 Reporting of (attempts of) bribery

It is important to emphasise that any person can report bribery attempts, even if it is an attempt to bribe a colleague by a third party. This report may be made to the appropriate contact point within the company. These will be dealt with according to the whistleblower procedure in force within the European Union. No negative consequences will be attached to reporting an attempted bribery.

### 3.3.2 Gift register

In addition to the risk of bribery through cash payments, there is also a high risk of generous gifts being offered to gain favour or influence decisions by certain individuals within the group. In order to minimise such risks, a register will be kept within the Sitra group of gifts received. Every gift that is received must be reported and placed on the register. In addition to the reporting, these gifts will also have to be approved. This will have to be done by the superior of the person receiving these gifts. There are only limited exceptions to this, which have to be reported to the staff.

### 3.3.3 Discipline

If it appears that criminal offences have been committed, among others according to the penal articles described above, the Sitra Group may take the following decisions:

- If it concerns an employee of the Sitra group: the employment contract can be terminated immediately in accordance with the applicable legislation.
- If it concerns a customer, supplier or any other person associated with Sitra: The agreement can be terminated on the grounds of gross negligence. Termination can take place without notice.

### 3.3.4 Training

With regard to employees, Sitra will provide training on this subject to every employee who is likely to encounter bribery attempts because of their position within the company.

This training will focus on the different types of bribery and go into more detail on how to recognise and report bribery.

If the customer, supplier or any other person associated with Sitra has no policy on bribery, this organisation/person must sign the Sitra policy. In doing so, they must state that they will comply with all the provisions of this policy and will not be guilty of the offences listed in this policy.