



# Neat Anti-Bribery and Corruption Policy

## 1. Introduction

At Neat, we are committed to our values of conducting business with transparency, trust, and respect. Bribery and corruption undermine ethical business practices, harm fair competition, and damage trust.

We strictly prohibit bribery, unethical advantages and conflicts of interest in any form. Compliance with applicable anti-corruption laws are mandatory for all employees, suppliers, and partners. Violations can be reported anonymously through our whistleblower mechanism.

This policy applies to all employees, contractors, managers, directors, and business partners and aligns with international best practices, including the OECD Guidelines for Responsible Business Conduct.

## 2. What is Corruption?

Corruption is the misuse of power for personal gain. This includes, inter alia, bribery, extortion, fraud, and trading in influence. Corruption distorts markets, weakens institutions, and violates human rights.

### What is Bribery?

Bribery is offering, promising, giving, or accepting anything of value to improperly influence a decision. It applies even if:

- The bribe is indirect (through an intermediary or third party).
- No money is exchanged—gifts, favors, and hospitality can also be bribes.
- The bribe does not succeed; the intent alone is a violation.

Bribery can take various forms, including payments, gifts, entertainment, donations, or preferential treatment.

## 3. Our Commitment: Zero Tolerance for Corruption

Neat has a strict zero-tolerance policy for bribery and corruption in any form.



We do not:

- Offer or accept bribes, including facilitation payments (small unofficial payments to speed up services).
- Engage in corrupt practices, directly or indirectly, with public officials or private individuals.
- Use third parties, agents, or intermediaries to circumvent anti-bribery rules.

Neat expects business partners, suppliers, and contractors to uphold the same high ethical standards.

## **4. Gifts, Hospitality, and Entertainment**

### **Acceptable Gifts and Hospitality**

While business courtesies can be appropriate, they must be:

- ✓ Reasonable in value and frequency (e.g., business meals, promotional items).
- ✓ Given without expectation of influence or favoritism.
- ✓ Compliant with local laws and company policies.
- ✓ Branded gifts - Example:. Branded swag, shirts, pencils, hats, other small branded gift.

### **Unacceptable Gifts and Hospitality**

- ✗ Cash or cash equivalents (gift cards, stocks, loans).
- ✗ Luxury items (watches, electronics, jewelry).
- ✗ Excessive or frequent entertainment, hospitality, gifts, etc.
- ✗ Gifts during contract negotiations or government dealings.

It is prohibited to offer, give, accept or receive gifts to or from government officials. Provision of hospitality to government officials shall only occur in exceptional circumstances, be of low value, and require prior written approval from the Chief Executive Officer (CEO), Chief Revenue Officer(CRO), Chief Financial Officer (CFO) or leadership team.

Employees must seek approval from the CEO, CFO or leadership team for any gift or hospitality that exceeds reasonable value or otherwise may raise concerns.



## 5. Conflict of Interest

Employees must avoid personal interests that conflict with Neat's business decisions. This includes, but is not limited to:

- Having a financial interest in a supplier or competitor.
- Awarding contracts to relatives or close friends.
- Directly hiring relatives or close friends
- Using Neat's name, resources, or influence for personal gain.

Employees must disclose potential conflicts of interest to their manager immediately.

## 6. Reporting Violations

All employees are responsible for preventing and reporting corruption. If you suspect a violation, you must:

- Report it to your manager, the legal team, or the people's team.
- Use Neat's whistleblower mechanism for anonymous reporting.
- Avoid retaliation—Neat protects all individuals who report concerns in good faith.

If in doubt, always ask yourself: Could this action be seen as improper or unfair? If yes, stop and seek guidance.

## 7. Enforcement and Consequences

Violating this policy may result in:

- Disciplinary action, including termination.
- Legal consequences, including fines and imprisonment.
- Reputational damage to Neat and its employees.

All employees must complete anti-bribery training and adhere to this policy at all times.

## 8. Business Partners and Suppliers

Neat seeks to work with partners who uphold ethical business practices. We require suppliers and contractors to:

- Comply with anti-corruption laws and policies.



- Maintain transparency in all transactions.
- Implement their own anti-bribery measures.

Neat reserves the right to audit and terminate contracts with non-compliant partners.

## 9. Final Reminder


Bribery and corruption have no place at Neat. Every employee is responsible for upholding our ethical values and reporting misconduct. By following this policy, we protect our business, our reputation, and the trust of our stakeholders.

If you have questions or concerns, contact your manager, Human Resources, the Health and Safety team, the Chief Financial Officer, the Chief Revenue Officer or the legal department. You can also use Neat's whistleblower mechanism for anonymous reporting.

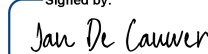
Approved the 26th of June 2025 by:

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