



Anti-Bribery and Anti-Corruption Policy



Banimmo (“we”; “us”; “our”) does not tolerate any form of bribery or corruption and refuses to enter into business relationships with anyone involved in illegal activities. Banimmo is committed to conducting its business fairly, honestly, lawfully and with integrity and trustworthiness. It expects its suppliers engaged in providing products and services to it - including Real Estate agents - (“Suppliers”) to have, or to make, a similar commitment.

This anti-bribery and anti-corruption policy (“Policy”) states Banimmo’s position on anti-bribery and anti-corruption and provides information and guidance in recognizing and dealing with bribery and corrupt conduct.

Being ethical. That’s what this Policy is all about.

This Policy supplements our **Code of Business Conduct and Ethics**. It applies to all of Banimmo’s Collaborator, including employees, (in-house) consultants, directors, and members of the executive committee (“Collaborator”; “you”; “yours”), and any person or organization performing services for and on behalf of Banimmo.

We have a zero-tolerance policy towards bribery and corrupt conduct in any form. Breaches of this Policy will not be tolerated and may lead to disciplinary and other sanctions, up to and including termination of employment.



## 1. Principles and rules

At Banimmo, we do not give or receive bribes to obtain or retain business. We don't use a third party, such as an agent or a consultant, to pay nor receive bribes. All Collaborator is prohibited from committing any corrupt conduct or act of active or passive bribery.

*Corrupt conduct* is a form of dishonesty or criminal offense undertaken by a person or an organization entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain. Corruption may include many activities, like offering, promising, granting, receiving, soliciting, or accepting an unjustified benefit, in order to unduly favor a party.

*Active bribery* means the giving, offering, promising, or authorizing any financial or other advantage or value to any individual (who can be a government official) or organization, with the intent to exert improper influence, induce the recipient to violate his or her duties, secure an improper advantage, or improperly reward the recipient for past conduct.

*Passive bribery* means the requesting, soliciting, agreeing to receive, or accepting from any individual (who can be a government official) or organization a bribe, influence payment, or any other improper or unlawful inducement, benefit or advantage.

Before offering, receiving, giving, being promised or promising anything of value from or to a person, all Collaborator must ask itself whether the envisaged behavior can be considered as bribery. If the answer to this question is "yes", the Collaborator must not proceed. In case of doubt, Banimmo's compliance officer must be consulted. Extra caution must be taken when (a) interacting with government officials; or (b) anything of value is offered by a Supplier during the negotiation or renewal period of a contract.

The value, benefit or advantage offered or received in the context of a bribe can take a variety of forms, such as:

*Cash (equivalents)*, which must never be offered nor accepted.

*Gifts, invitations, personal benefits.* Banimmo is a commercially active company and as such acts with consultants, Suppliers, and other parties in accordance with reasonable and common commercial practices. As a consequence, the offering and/or acceptance of gifts, invitations or other signs of hospitality and personal benefits from a Supplier, a client or another third party, are considered being in accordance with reasonable and common commercial when they are (a) modest (in value and frequency) and (b) appropriate (both in time and place).

Banimmo therefore, in accordance with its integrity policy, has developed a Gift Policy regarding the giving or acceptance of gifts, invitations or personal benefits. This Gift Policy was approved by the CODB.

*Charity, good causes and sponsorship* . Banimmo may provide support or funding to external organizations from various sectors. However, such funding may lead to bribery if carried out in order to obtain an undue advantage or to influence an action inappropriately. To avoid the risk of bribery, Banimmo ensures that: (i) the support or funding it provides is (a) reasonable, (b) transparent regarding the identity



of the recipient, the amount and the purpose for which it is intended; and (ii) the supported organization has no decision power or influence over Banimmo's decisions and/or activities.

*Facilitation payments*, i.e. moderate payments made to a government official in order to expedite or secure the performance of a routine, non-discretionary government action such as issuing permits or licenses or obtaining utility services, are strictly prohibited under this Policy.

## 2. Detection and prevention

*Supplier due diligence - warning signs*. Banimmo is very careful when it comes to selecting or accepting Suppliers. We carry out due diligence aimed at knowing and assessing the integrity risks to which it may be exposed in its relationships with its Suppliers. Such due diligence is based on the assessment of the Supplier's profile, its involvement in cases of bribery or corrupt conduct, its reputation, and/or its anti-bribery and anti-corruption policies and practices. To reduce the risk of bribery or corrupt conduct, Banimmo and its Collaborator pay special attention (and where appropriate refuse accepting Suppliers) in case any of the following warning signs in relationships with Suppliers pop up:

- (a) the Supplier does not have the proper resources to perform the contemplated work or project;
- (b) the Supplier does not present the experience to perform the contemplated job;
- (c) the Supplier has no transparent structure or insists in secrecy in dealings;
- (d) the Supplier refuses to sign any document containing an anti-bribery and anti-corruption commitment.

*Anti-Bribery and Anti-Corruption clauses*. Contracts between Banimmo and Suppliers and third parties typically contain an anti-bribery and anti-corruption clause in which the contracting parties: (a) declare their knowledge of the applicable anti-bribery and anti-corruption legislation, and (b) commit to fully comply with such legislation. Failure to comply with such contractual clauses can generate remediation measures, from requesting clarifications to suspension or termination of contract.

*Internal Controls*. Any infringements can be reported via Banimmo's website ([www.banimmo.be](http://www.banimmo.be)) and will be confidentially investigated. Demonstrable infringements will always be dealt with appropriately.

*Training and certification of compliance*. Banimmo ensures that all Collaborator receives adequate training and familiarizes themselves with this Policy. The Collaborator is required to confirm that they have read and understood this Policy and that they will comply with it.

*Books and Records*. Banimmo is required by law to keep complete and accurate books, records and accounts that in reasonable detail document the source and use of its revenues and assets. *Off the books* accounts and false or deceptive entries in Banimmo books and records are strictly prohibited. All financial transactions must be documented, regularly reviewed and properly accounted for in the books and records of Banimmo. The retention and archive of Banimmo books and records must be consistent with standards and tax and other applicable law and regulations. Banimmo's finance department is responsible for, and shall take care of, the administration of our books and records and accounting requirements.



*Speak up!* If you have any questions regarding this Policy, you should speak to our compliance officer. We encourage all Collaborator to speak up for what is right when something is wrong. In no event will a member of the Collaborator who makes a report be subject to retaliation. No action will be taken against a member of the Collaborator who expresses a concern that is found to be inaccurate if the concern is expressed in good faith. On the other hand, false or abusive accusations will not be tolerated and may result in disciplinary action.

Version history	
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1	15/02/2024