

Fastned Anti-corruption and bribery policy

Fastned is committed to conducting business with the highest standards of honesty, transparency, and ethical responsibility. Employees, contractors, and partners must not engage in any form of bribery, kickbacks, or corruption, whether in dealings with government officials, clients, vendors, or other stakeholders. This includes offering, giving, receiving, or soliciting anything of value as an improper influence on business decisions. We uphold a zero-tolerance policy against all forms of bribery and corruption, ensuring compliance with anti-bribery laws, including the UK Bribery Act 2010 and other applicable regulations.

Breaches of this policy are treated seriously and may lead to disciplinary action, including termination of employment or legal consequences.

This policy is reviewed periodically to maintain alignment with legal and ethical standards.

Owner: Director Legal & Compliance

Date: February 28, 2025

Approved by: CFO on behalf of Managing board

Scope and Applicability

This policy applies to all individuals representing Fastned, including:

- Employees (full-time, part-time, interns, temporary workers)
- Directors, officers, and executives
- Suppliers, contractors, agents, consultants, and third-party representatives
- Business partners and external stakeholders working on behalf of Fastned

All employees and external partners must comply with this policy and report any suspected violations promptly.

Definitions

Bribery occurs when one person offers, gives, requests, or receives something of value to improperly influence a business decision. It includes:

- Offering or accepting money, gifts, excessive hospitality, expenses, or preferential treatment in exchange for business favors.
- Making facilitation payments (unofficial payments to expedite business approvals).

- Kickbacks or hidden commissions given to secure a contract or advantage.
- Offering or accepting any benefit that could be perceived as influencing a decision unethically.

Employees must not engage in any corrupt activities, even if such practices are common in certain regions or industries.

Prohibited Conduct

Fastned strictly prohibits:

- Accepting or offering a bribe, cash, gift, or favor in exchange for business advantages.
- Giving or receiving any gifts or hospitality during negotiations, regulatory approvals, or tender processes.
- Accepting "facilitation payments" to expedite permits, customs clearance, or approvals.
- Making political donations on behalf of Fastned.
- Threatening or retaliating against someone who refuses to engage in bribery.

If employees are unsure whether an action constitutes bribery, they must consult their line manager or the Director Legal & Compliance.

Gifts and Hospitality

We are committed to maintaining the highest standards of integrity and professionalism in all aspects of our business. This includes how we handle gifts and invitations from partners, suppliers, and other stakeholders. Given our core values, it is crucial that our employees understand and adhere to the following guidelines when offered gifts or invitations to events.

Criteria for Acceptable and Unacceptable Gifts:

- Alignment with Company values;
- Company relationship with the Giver;
- Value of the gift;

All employees must handle, disclose and log gifts via the Company's Gift Reporting System in line with the [Gifts and Invitations Policy \(2025\)](#).

Facilitation Payments and Kickbacks

Fastned strictly prohibits all forms of facilitation payments (small payments made to officials to speed up routine tasks).

- Employees and partners must refuse any demand for facilitation payments.

- If local laws require specific payments, employees must obtain pre-approval from the Legal & Compliance Department.
- Any pressures or demands for bribery, extortion, or unofficial payments must be reported immediately.

Employees are protected under Fastned's [Whistleblower Policy](#) when reporting unethical demands.

Record-Keeping and Compliance

To ensure transparency in business dealings:

- All expenses related to gifts, hospitality, donations, or contracts must be accurately logged.
- No "off-the-books" accounts should be kept to conceal improper transactions.
- Contracts and financial transactions must be approved by the Legal & Compliance team to prevent fraud.
- The finance department regularly audits financial records to ensure compliance.

How to Raise a Concern (Whistleblower Policy)

Fastned encourages employees to report suspected bribery or corruption:

- Speak directly to your line manager or the Legal & Compliance Director.
- Use the confidential whistleblower email: whistleblower@fastnedcharging.com.
- Call the Whistleblower Hotline: +31 20 809 0365 (available 24/7).
- Submit a report anonymously via secured channels if confidentiality is necessary.

Fastned strictly prohibits retaliation against employees who report misconduct in good faith.

Training and Awareness

Employees (both full and part time) are provided training on ethical standards through our Legal onboarding sessions. This includes:

- Ethical decision-making scenarios.
- Recognizing bribery risks in daily work.
- Case studies on gifts and hospitality violations.
- Interactive compliance quizzes.

Failure to participate in required training may impact performance evaluations (refer to [Code of conduct](#)).

Consequences of Violations

Employees or third parties found violating this policy may face:

- Internal disciplinary action (including suspension or termination).
- Legal prosecution and financial penalties under anti-bribery laws.
- Contract termination if vendors or partners engage in bribery.

Fastned reserves the right to pursue legal action against any individual or entity that damages company integrity.

Acknowledgment & Compliance Statement

Fastned employees acknowledge the content of this policy by agreeing with Fastned's [Code of conduct](#) and confirm compliance by signing their employee contract.