



White Raven IT – Anti Fraud & Anti-Corruption Policy

Introduction

This Anti-Bribery, Anti-Fraud, and Anti-Corruption Policy outlines the standards and procedures that White Raven IT BV, an IT advisory services company based in the EU, adheres to in order to ensure compliance with legal and ethical standards. This policy applies to all employees, contractors, consultants, and any third parties acting on behalf of White Raven IT BV.

We are committed to conducting our business in an honest, transparent, and ethical manner. We have a zero-tolerance policy towards bribery, fraud, and corruption and will take appropriate action against anyone involved in such practices.

Scope

This policy applies to all:

- Employees (including part-time, full-time, and temporary staff)
- Contractors
- Consultants
- Third-party representatives acting on behalf of White Raven IT BV.

Policy Statement

1. Bribery

- Definition: Bribery is the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in charge of a public or private legal duty.
- Policy: No employee or representative of White Raven IT BV shall, directly or indirectly, offer, give, request, or receive any bribe or improper advantage in any form, whether in cash, gifts, or favors, to or from any individual, public official, client, or third party.
- Example: This includes facilitating payments (small, unofficial payments to speed up routine governmental actions) or providing gifts beyond token amounts.

2. Fraud

- Definition: Fraud involves wrongful or criminal deception intended to result in financial or personal gain.



- Policy: Any form of fraud, including but not limited to, false representation, failing to disclose information, or abuse of position to gain financial benefit or avoid financial loss, is strictly prohibited.
- Example: Misreporting expenses, manipulating financial statements, or embezzling funds are considered fraudulent activities.

3. Corruption

- Definition: Corruption involves the abuse of power for private gain and can manifest as bribery, extortion, nepotism, or other unethical behavior.
- Policy: Any behavior that constitutes corruption, including offering or accepting kickbacks, unfairly favoring friends or family, or otherwise abusing one's position for gain, will not be tolerated.
- Example: Awarding contracts to friends or family without a proper and fair bidding process is an example of corruption.

Procedures for Compliance

1. Training and Awareness

- All employees and third-party contractors must be made aware of this policy and receive training on how to identify and prevent bribery, fraud, and corruption.
- New hires will receive this training during onboarding, and refresher training will be provided annually.

2. Reporting Concerns

- Internal Reporting: Employees are required to report any suspicions or evidence of bribery, fraud, or corruption to their direct manager or via the company's confidential reporting email at compliance@whiteravenit.be.
- Whistleblower Protection: White Raven IT BV ensures that employees who report unethical behavior in good faith will not face retaliation or unfair treatment as a result of their report. The company maintains confidentiality to the fullest extent possible.

3. Gift and Hospitality Reporting

- Any gifts or hospitality offered or received beyond a nominal value of EUR 100,00 must be reported to management and recorded in the Gift and Hospitality Register.
- Employees are advised to decline any gifts or hospitality that could influence, or appear to influence, decision-making.



4. Conflict of Interest Disclosure

- Employees must disclose any personal relationships or financial interests that could potentially conflict with their duties at White Raven IT BV.
- All conflicts of interest must be declared in writing and reviewed by management to ensure impartiality.

5. Due Diligence on Third Parties

- Before engaging with any third-party contractors, clients, or suppliers, White Raven IT BV will perform due diligence to assess their integrity and ensure they comply with anti-bribery, anti-fraud, and anti-corruption standards.
- Contracts with third parties must include anti-bribery and anti-corruption clauses.

Monitoring and Enforcement

1. Internal Audits

- White Raven IT BV will conduct periodic audits to ensure compliance with this policy. Audits will assess financial records, the Gift and Hospitality Register, and any conflict of interest disclosures.

2. Disciplinary Action

- Any breach of this policy will result in disciplinary action, which may include termination of employment, reporting to legal authorities, or other appropriate measures.
- For third-party contractors, breach of this policy will result in termination of contracts and potential legal action.

3. Investigation Procedures

- When a report of bribery, fraud, or corruption is received, a thorough and confidential investigation will be conducted. If the investigation reveals any wrongdoing, appropriate actions will be taken, including legal proceedings where necessary.
- Investigations will be conducted by a designated compliance officer or an external investigator to ensure impartiality

4. Record-Keeping



- All records related to compliance with this policy, including due diligence reports, internal audits, investigations, and disciplinary actions, will be securely maintained for a minimum of five years.

Approval and Documentation Process

1. Approval Thresholds

- Purchases exceeding €1.000,00 require approval from the company's management, with a documented assessment of sustainability and cost-effectiveness.

2. Record-Keeping

- Maintain records of all procurement activities, including supplier assessments, sustainability criteria evaluations, and contract agreements.
- Document any deviations from the sustainability criteria and provide justification for such exceptions.

Compliance and Monitoring

- Internal Audits: The company will conduct periodic internal audits to ensure compliance with this procurement policy, including the sustainability criteria.
- Continuous Improvement: The procurement team will review the sustainability criteria annually and recommend improvements based on evolving best practices and market trends.

Training and Awareness

- Employee Training: All employees involved in procurement activities will receive training on sustainability in procurement, including how to apply the sustainability criteria during the procurement process.
- Supplier Education: Where possible, White Raven IT BV will work to educate suppliers on sustainability practices and encourage them to align with the company's values.

Review of Policy

This policy will be reviewed annually by management to ensure its relevance and effectiveness. Changes will be made to align with any new regulatory requirements,



industry standards, and advancements in sustainable procurement practices. Changes will be communicated to all employees and contractors.

Contact Information

For questions or further information and concerns related to this policy, please contact our Compliance Officer at compliance@whiteravenit.be.

This policy ensures that White Raven IT BV complies with the EU anti-bribery and anti-corruption laws, such as the European Union's Anti-Fraud Office (OLAF) standards and the UK Bribery Act 2010, while it promotes a culture of integrity and accountability within the company.