

1 SCOPE AND PURPOSE

This KBC General Code of Conduct is binding on all suppliers. It is considered a minimum set of guidelines, so that local KBC entities and suppliers are allowed to agree more strict terms, provided that the basic principles set out in this document are not tampered with. This Code of Conduct is a general document, based on the values of the KBC group, and forms the basis for specialized codes for specific target groups, Group Compliance Rules, Group Standards, etc.

2 CONFLICTS OF INTEREST

By supplying products or services, Supplier acknowledges to have no conflict of interest with KBC. Supplier shall avoid business activities that could or would lead to conflicts of interest between Supplier's own interests and those of the KBC group.

3 DRESS CODE

A professional attitude is a pillar of customer trust and satisfaction. Supplier's staff working on KBC premises shall be dressed neatly, in accordance with the general standards on smart business clothing.

4 NARCOTICS AND ADDICTIVE SUBSTANCES

The use of narcotics or addictive substances could lead to KBC suffering a significant loss of reputation or financial damage. Supplier's staff shall not work under the influence of drugs or alcohol.

5 GIFTS, BRIBES & OTHER TYPES OF CORRUPTION

KBC aims to conduct business in a socially responsible manner and wishes to promote Corporate Social Responsibility (CSR) among its suppliers, as further detailed in the KBC Corporate Social Responsibility Policy. Furthermore, the KBC group attaches great importance to the transparency of relationships between its employees and third parties and, in particular, to the integrity of its employees.

KBC rejects all forms of bribery and corruption. Bribes may not be offered or solicited or mediated for a third party. Corruption is considered a breaking point. Should KBC become aware of it, the business relationship with Supplier will be frozen and an in depth investigation carried out, which may not only lead to mandatory changes at the side of the supplier, but also to contract cancellation.

KBC aims to avoid that any of its employees who are in contact with suppliers, or who can influence KBC's purchasing decisions, would find themselves in a position of direct or indirect dependence on a supplier. Supplier shall therefore refrain from supplying gifts or entertainment to KBC employees (or, indirectly, to their relatives) in violation of the rules described below. A maximum of 250 EUR applies for all gifts and entertainment offers (calculated per KBC employee, per year, per supplier), subject to the following limitations:

- cash or equivalents (such as vouchers or financial instruments) are only allowed if donated to charity organisations approved by KBC, or for weddings, births, jubilees, retirements and communions;
- gifts and entertainment offers are not accepted during a tendering procedure (up to contract signature); and
- they must always be in line with good taste and decency.

6 MONEY LAUNDERING & TERRORIST FINANCING

Money laundering and terrorist financing are crimes, and KBC has a statutory duty to combat these practices. Supplier shall not, in any

way, get involved in money laundering or terrorist financing.

7 TAX LAWS

KBC is a responsible taxpayer, basing itself on professionally executed compliance with tax laws and legitimate tax planning, supported by valid business objectives. Mechanisms may not be set up that are contrary to standard practice and that clearly aim to promote or result in tax fraud. Additionally, no assistance may be provided in any operations whose purpose is to procure an unlawful tax benefit.

8 REPRESENTATION AND AUTHORISATION

In business relationships, KBC is always represented by a particular employee. In such relationships, KBC employees communicate directly with third parties and participate in building long-term business relationships. Consequently, all signature and decision-making requirements and trading limits must be observed and the necessary authorisation must be obtained. KBC may only be entered into commitments to the extent that the requisite authorisation has been granted.

9 DATA PROTECTION & CONFIDENTIALITY

KBC's relationship with customers is based on trust and confidentiality. The conduct of KBC's business is in part determined by the protection of confidential internal customer information, and decisions are to be taken on the basis of complete and correct data. All information relating to KBC's customers or business partners that Supplier would gain access to, shall therefore be treated as confidential information, and must be processed in accordance with applicable data protection legislation (such as Directive 95/46/EC and its national implementations). All internal information concerning customers and business partners shall be protected from unauthorised usage, disclosure, alteration or destruction. That information may be used only for the (professional) purpose for which it has been collected. The protection of confidential information applies to all data carriers, regardless of their form.

At no time may any false or biased data be entered into the KBC information systems or information be withheld that is required for decision-making purposes. Unauthorised persons may never be enabled to use the authorisations or technical means given to staff to access KBC company premises or information systems. In all matters, the legal and internal regulations relating to the confidentiality, handling and processing of personal data must be observed.

10 PROTECTION OF INVESTORS & CAPITAL MARKETS

In all financial markets, market abuse – *i.e.* abuse of insider information and market manipulation (price manipulation, diffusion of false information) – is one of the most serious offences against trading ethics. Trading based on confidential information obtained through KBC or on transactions involving a conflict of interests is not permitted. For the same reason, Supplier cannot carry out activities that distort the market price of negotiable financial instruments, or increase their trading volume artificially in order to mislead market participants.

All confidential internal information relating to the KBC group, customers or business partners that Suppliers has become privy to in the course of their work must be protected, and may not be used for personal benefit or the benefit of others.