

# Anti-corruption and anti-money laundering guidelines

version 1.0



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# **SALUD FOODGROUP EUROPE B.V.**

## **Anti-corruption and anti-money laundering guidelines**

How we want to do business together



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## 1. INTRODUCTION AND PURPOSE OF THESE GUIDELINES

Salud Foodgroup Europe B.V. (hereafter “Salud”) was founded in 1995 in the Netherlands. We serve our customers in Europe, the Middle East, Asia, Latin-America and Oceania from our head office in Oosterhout, the Netherlands. The departments of Quality and Sustainability, Packaging, Supply Chain, Research and Development, Sales, Marketing, Finance and IT can be found here.

We produce and distribute frozen avocado products, appetizers, tortillas, pita breads and tropical fruit. These product categories also represent the colours green, orange, red and yellow in our logo. The name ‘Salud’ derives from the Spanish expression of good wishes for a good health. Avocados are, and have been, our main product category. We like to promote usage and inspire to use avocados in all kinds of dishes, since they are a fantastic addition to your health and any of your favourite dishes. Thereby we offer the convenience to be able to use the same quality of Hass avocados throughout the entire year, for foodservice, retail, or industry, by using frozen avocado products, ripened to perfection.

Salud’s anti-corruption, fraud and anti-money laundering measures guidelines shows our attitude to the fight against corruption.

The guidelines are based on Dutch legislation and are in line with the OECD's declaration of action on bribes and publicly supported export credits.



## **2. REGULATIONS AND RECOMMENDATIONS**

The guidelines are based on the following regulations, recommendations and conventions, among other things:

- OECD anti bribery convention
- The Dutch criminal act
- The Dutch money laundering and terrorist financing prevention act



### 3. ANTI CORRUPTION, FRAUD AND ANTI-MONEY LAUNDERING

To protect Salud's reputation and avoid criminal liability, it is important for Salud not to be associated with the criminal activities of others.

Salud is committed to preventing fraud and corruption, and in particular, Salud and its employees guard against Salud receiving the proceeds of criminal activities.

#### 3.1 ANTI-CORRUPTION AND FRAUD

Salud is committed to the prevention of fraud and corruption and the development of an appropriate anti-fraud culture. Salud has a zero-tolerance policy for fraud that could potentially cause serious damage to Salud's reputation and expose both individuals and the company to legal prosecution.

No employee of Salud may knowingly allow a company or another employee to commit a fraudulent act. The employees of Salud must not give, promise, offer, request or receive any compensation or benefits that are contrary to applicable law and good business practice or that could or would be perceived to affect the objectivity of decision-making.

#### 3.2 ANTI-MONEY LAUNDERING

All Salud employees must be vigilant against money laundering. Money laundering occurs when the proceeds of criminal acts are disguised by legitimate business transactions. Conversely, legitimate financial resources can be used for criminal activities, including terrorism. All businesses are at risk of being used in this way - and Salud must be vigilant to protect its reputation and ensure that Salud and its employees comply with the law. Indications of money laundering include a customer or third party not wanting to give personal information, wanting to pay large sums of cash, not paying attention to the amounts they have to pay, using different accounts or payment methods, or using an account located in an unusual place.

In countries in which Salud operates, applicable laws and regulations relating to taxation and anti-money laundering measures must be complied with. The employees of Salud must not accept, support or facilitate violations of regulations related to taxes and money laundering.

The employees of Salud should be alert to circumstances or behaviour that could indicate corruption, fraud and/or money laundering. All employees are expected to immediately report any incident or suspicion of corruption, fraud and/or money laundering to the Legal & Compliance Officer (by email: [legal@salud.nl](mailto:legal@salud.nl)).

All employees are also expected to cooperate honestly with any investigation of corruption, fraud and/or money laundering.