

## ANTI-BRIBERY, ANTI-MONEY LAUNDERING AND FRAUD POLICY

### 1. PRINCIPLES AND CONTENT

#### Introduction

This Policy falls under Evac Group's ("Company") Code of Conduct. In this policy, anti-bribery, anti-money laundering and fraud related principles and instructions are presented in more detail.

One of the Company's core values is to uphold responsible and fair business practices. The Company is committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities.

The Company has a strict policy against bribery, corruption, fraud and money laundering, and is committed to acting fairly, with integrity and in compliance with laws in all its business dealings and relationships and implementing and enforcing effective systems to act against any deviations.

#### Purpose and Scope of Policy

This Policy defines the Company's position on any form of bribery, corruption, fraud and money laundering, as well as provides guidelines to ensure that anti-bribery, corruption, fraud and anti-money laundering rules and policy are aligned with the laws and regulations. This policy shall be followed in all the countries where Company has operations.

This document aims to enable employees and personnel in the Company to understand the risks that are associated with these activities and to detect and prevent them. It can be treated as a guide, where employees are encouraged to recognize, prevent and report any wrongdoings.

The Policy applies to all permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons"). All employees and associated persons are expected to adhere to the principles set out in this Policy.

#### What is Bribery, Corruption and Money-Laundering and Fraud

Bribery and corruption are actions where one tries to impact on the performance of the duties of other person(s) in a way contrary to how their employer, organization or public would expect them to act. Usually, bribes are in form of improper payments, personal commissions, facilitation payments or excessive gifts. They vary in shapes and forms: from gifts to job positions.

Money laundering is an illegal process in which funds originating from criminal activities are recycled through a legal payment system to make them appear to have come from a legitimate source. There are various ways how criminals launder money. Generally, money laundering can be broken down into three stages:

- **Placement** – the initial entry of illicit money into the financial system
- **Layering** – the process of separating the funds from their source
- **Integration** – the money is returned to the criminal from legitimate-looking source

Fraud refers to dishonestly obtaining a benefit, or causing a loss, by deception or other means. In practice, fraud may be knowingly making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss, or risk of loss, to another.

Company aims with this Policy to support its employees to better understand these concepts and act professionally and in compliance with laws towards these matters.

## Legal Obligations

This Policy is based on laws and regulations as well as commonly agreed good business practices and it applies to the Company's conduct in all the countries where it operates.

It is an offence for an employee or an associated person to bribe another person during doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company, or to commit a fraud whatsoever. Likewise, one might become guilty of money laundering by receiving such money while being aware of its nature.

The Company can be liable for these offences where it has failed to prevent such activity by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

All business should be treated with high ethical standard, especially when engaging with governments. Whenever conducting business with national or local governments, agencies, state or local government owned companies special attention shall be addressed, and e.g. the following shall be complied with:

- No illicit or secret payments in any form are to be made to any governmental body or persons, or received
- Deviations from contractual requirements are not allowed without written approval from both sides
- Any attempts to influence governmental officials to do something illegal are not allowed (or to be influenced)
- Any concerns of corruption activity must be communicated to all relevant parties
- Governmental officials cannot be misled
- Any attempts to obstruct any authorized governmental officer are not allowed
- No fraudulent behavior (e.g. making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss)

When involved with the certification or testing activities, nobody shall in no way try to effect of the results or the testing environment.

- One must not to offer, accept nor receive any form of bribes during the testing
- No modifications to the results or certificates are accepted
- Furthermore, if inappropriate testing is taking place, concerns should be raised and addressed immediately
- No untrue or misleading representations

With respect to the prevention of money laundering:

- One must always conduct due diligence on a new business counterparty when establishing new business relationships, and to the extent necessary, also throughout the course of the business relationship. This may include, for instance, identifying the business party, their representative, and the ultimate beneficial owner, and obtaining information on the nature and extent of their business and transactions, and the grounds for the use of a service or product.
- When in doubt of the reliability of the information obtained from the business party, or of the origin of the property that is the object of the business transaction, report your concerns to your supervisor, and do not proceed with the transaction until the matter has been fully investigated.

## Policy Statement of Key Principles to be Applied

According to this Policy all employees and associated persons are required to comply with any applicable anti-bribery, fraud, anti-corruption and anti-money laundering legislation. Personnel is expected to act honestly, responsibly and with high integrity. Furthermore, they are expected to operate ethically, professionally and lawfully, with respect to the Company's core values and law.

Bribery fraud or corruption of any kind is strictly prohibited. Under no circumstances shall any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe. It is forbidden to engage in any fraudulent behavior, e.g. making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss. Likewise, money laundering (which also includes receiving laundered money while being aware of its nature) is strictly prohibited and all employees and associated persons should always take the necessary steps to detect and prevent such activities.

The Company recognizes that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is always expected of all employees and associated persons.

For the Company's rules and procedures in relation to the receipt of business gifts from third parties and corporate hospitality offered to or received from third parties, are explained more detailed in the Company's Purchasing Policy.

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited, but it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

## **2. PROCEDURES**

### **Responsibilities and reporting procedure**

It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery, fraud, corruption or money laundering. All breaches of this Policy must be reported to any Group Management Team Member.

The Company is committed to taking appropriate action against such behavior. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

### **Sanctions for breach**

A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with Company's policies and practices. Depending on the nature and gravity of the breach, it may be treated as gross misconduct and could render the employee liable to summary dismissal. As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

### **Monitoring**

The Company's Group Management Team has the lead responsibility for ensuring compliance with this Policy. The management is responsible for monitoring whether and how effectively the Policy is followed in practice, and also provides applicable reporting in this regard to the Board of Directors of the Company.