nothing to waste

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Evac Group Oy

Evac Group Anti-Bribery, Anti-Money Laundering, Anti-Corruption and Anti-Fraud Policy

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1. Principles and content

1.1 Introduction

This Evac Group Anti-Bribery, Anti-Money Laundering, Anti-Corruption and Anti-Fraud Policy ("Policy") falls under Evac Group's ("Evac" or ''Company'') Code of Conduct. In this Policy, anti-bribery, anti-money laundering, anti-corruption and anti-fraud related principles and instructions are presented in more detail.

The Company is a participant in the UN Global Compact and is committed to its 10th Principle to work against corruption in all its forms, including extortion and bribery. Furthermore, this policy draws from section VII of OECD Guidelines for Multinational Enterprises on Responsible Business Conduct 2023. Evac upholds responsible and fair business practices and 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.

The 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.

1.2 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, anti-corruption, anti-fraud and anti-money laundering rules and policies are aligned with the laws and regulations. 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.

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

Each employee, director and member of the Board of Directors must understand and comply with this Policy. We also expect our partners to comply with the relevant laws and similar principles as set out in this Policy.

Any Evac employee who suspects a violation of this Policy must speak up and raise the issue to their immediate manager, Group General Counsel or to any member of the Group Leadership Team (GLT).

Persons who are suspected of having breached this Policy will be investigated. Any breach of this Policy will be considered and dealt with according to the applicable local laws and Evac's policies and practices.

In addition to the requirements set forth in this Policy, applicable local legislation needs to be considered and complied with.

Each business line and legal entity is responsible for ensuring that this Policy and the respective applicable regulations are followed, and that needed competence is in place.

1.3 What is bribery, corruption, money-laundering and fraud?

Bribery and corruption are actions where one tries to impact the performance of the duties of other person(s) in a way contrary to how their employer, organisation or the public would expect them to act. Bribes may take the form of, *inter alia*, direct or indirect offer, promise, grant or authorization to give improper payments, personal commissions, facilitation payments or excessive gifts. They vary in shape and form: from gifts to job positions. In essence, corruption is about abuse of power for personal gain.

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 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 a 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.

1.4 Legal obligations

It is an offence to bribe another person while 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 fraud whatsoever. Likewise, one might become guilty of money laundering by receiving such money while being aware of its nature.

Evac expects its employees and directors to act in the best interest of Evac and avoid an interest or situation that conflicts or may appear to conflict with his or her professional duty. A conflict of interest exists when financial or other personal incentives influence – or may appear to influence – an employee's professional performance. Evac’s employees must disclose potential conflicts of interest to Evac and refrain from engaging in situations where conflicts of interest may arise.

For example, a conflict of interest may arise if an employee has a business interest in a company which is a potential customer or supplier to Evac and that particular employee is engaged in contract drafting. A conflict of interest may also arise if a friend or relative of an employee applies for a position with Evac and that particular employee is involved in the recruitment process.

What does it mean for me? Avoid situations that may compromise – or may appear to compromise – your decision making. Inform your manager of any potential conflicts of interest involving yourself or others. Don’t give preferential treatment to personal contacts such as friends and family.

The Company can be liable for these offences where it has failed to prevent such activity by employees, directors or by its partners. In addition to an unlimited fine, it could suffer substantial reputational damage.

All business should be treated with high ethical standard, especially when engaging with the public sector. Whenever conducting business with the public sector (*e.g.*, national or local governments, agencies, state or local government owned companies), special attention shall be given, 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, or be influenced by, governmental officials to do something illegal are not allowed.
- Any concerns of corruption activity must be communicated to all relevant parties.
- Governmental officials cannot be misled.
- Any attempts to obstruct (for example by not following their decisions) 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, Company or another or causing a loss).

When involved with the certification or testing activities, nobody shall in any way try to affect of the results or the testing environment.

- One must not offer, accept or receive any form of bribes during the testing.
- No modifications to the results or certificates are accepted.
- 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.

1.5 Policy statement of key principles to be applied

According to this Policy all employees and directors are required to comply with any applicable anti-bribery, anti-fraud, anti-corruption and anti-money laundering legislation. Employees and directors are 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 Code of Conduct, Company's 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 directors 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, strict adherence to the guidelines set out in this Policy is always expected of all employees and directors.

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 in more detail in the Evac Group Sourcing and Procurement Policy.

The giving of business gifts to customers, suppliers and other business partners 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.

1.6 Third party screening

1.6.1 Counterparty screening

Improper conduct by third parties and intermediaries (such as customers, suppliers, agents, distributors, joint venture partners and consultants) can cause material damage to Evac's goodwill and give rise to legal liability for both Evac and its representatives. Accordingly, it is essential that a high degree of care is exercised before engaging third parties on behalf of Evac.

The Company's counterparty screening process includes an enhanced focus on high-risk regions, by taking additional precautions with regards to existing customers and suppliers in regions that have scored the lowest points in the latest available Corruption Perceptions Index maintained by Transparency International. In addition to separately committing to the Company's Code of Conduct, such customers and suppliers are required to complete an anti-bribery and anti-corruption questionnaire to ensure ongoing compliance with this Policy. Non-compliance with this Policy may lead to the suspension or termination of the business relationship.

1.6.2 Acquisitions

Evac may be held liable for past bribery, money laundering, fraud and corruption violations of a business acquired, in whole or in part. Evac must therefore review, as part of any acquisition due diligence process, business activities of the acquired business in regard to anti-bribery and corruption compliance.

The due diligence should allow Evac to assess not only the risks the target's operations will present going forward, but also potential exposure stemming from target's past activities.

2. Procedures

2.1 Responsibilities and reporting procedure

It is the contractual duty and responsibility of all employees and directors to take steps that are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery, fraud, corruption or money laundering. Managers should ensure that their teams fully understand and are expected to comply with the standards and requirements stipulated in the Policy. All breaches of this Policy must be reported to a Group Leadership Team Member or through Company's whistleblowing channel Whistleblowing - Evac.

Evac provides general and role-based training to its board members, management and employees in compliance with this Policy. Training is consistent with Evac's risk profile and appropriate to employees' responsibilities and is repeated at regular intervals.

The Company is committed to taking appropriate action in response to conduct that breach this Policy. 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 partners.

2.2 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 partners are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

2.3 Review and follow-up

Compliance with this Policy by all Evac Group entities and directors and employees will be monitored through internal audits, and routine follow-ups of all reported matters, including KPI follow-ups (such as number of violations and corrective actions taken).

Revision History

REV. #	DESCRIPTION	AUTHOR	APPROVER	APPROVAL DATE	EFFECTIVE DATE
1	First release	Sampo Kättö	CEO	2 June 2021	2 June 2021
2	Amendments	Sampo Kättö	CEO	3 May 2023	3 May 2023
3	Amendments	Sampo Kättö	CEO	17 March 2025	17 March 2025
4	Amendments	Sampo Kättö	The Board of Directors of CAVE BidCo Oy	23 Sep 2026	1 Nov 2026



Fresh water generation | Vacuum systems | Wastewater treatment | Wet waste treatment | Dry waste treatment | Marine growth prevention | Corrosion protection

Evac is the world's leading provider of integrated water and waste management systems, as well as corrosion-protection systems for the marine, offshore, and building industries. With offices across four continents and representatives in more than 70 countries, we are close to our customers wherever they are. We contribute to a better environment and cleaner seas by helping our customers eliminate waste, conserve water, and mitigate emissions. Our ambitious target is to enable a future with no waste.

Read more about our solutions
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Innovative water and waste technologies on land and sea driving a future with no waste.