



## Anti Bribery Policy

### Purpose of the Anti-Corruption Policy

Outpost24 want to adhere to laws in a broad sense, incl. bribery and corruption laws. Accordingly, this policy outlines acceptable and non-acceptable behaviours to ensure compliance with among other anti-corruption laws.

### Helpful Definitions

**Bribe:** Anything of value given in an attempt to affect a person's actions or decisions in order or to gain or retain a business advantage. Anything of value includes cash, entertainment or other gifts or courtesies.

**Corruption:** The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

**Facilitation payments:** Small sums paid to government officials to facilitate or expedite routing. Non-discretionary government actions are considered facilitation payment.

**Kickbacks:** The return of a sum already paid or due as a reward for awarding of furthering business.

### Typical Areas of Bribery

The areas of business where corruption, including bribery, can most often occur include:

1. Gifts, Entertainment and Hospitality
2. Facilitation Payments
3. Procurement Process
4. Political, Community and Charitable Contributions

#### 1. Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality are acceptable if they are reasonable, proportionate and made in good faith and in compliance with our company policies.

Criteria for assessing if a gift, entertainment and/or hospitality are for example:

- Is the intent to build a relationship or is it something else?
- Can the details stand for public scrutiny?
- If we were the receiving party, how would we perceive it?

If you are in doubt in any way on how to interpret any of the above questions in a given situation, ask the Legal Department.

As a general rule, you may give a modest gift to external parties when appropriate, if you observe local law and it is accepted/approved by the Legal Department.

## **2. Facilitation Payments**

Facilitation payments are not allowed and if you are in doubt whether a payment could be regarded as such, as the Legal Department.

## **3. Procurement Process**

You must follow Outpost24 processes and adhere to the system of internal controls. Supplier selection should never be based on receipt of a gift, hospitality or payment. I.e. we want to have suppliers that deliver the best services at the best price based on a fair competition.

## **4. Political Community and Charitable Contributions**

You are not allowed to make political contributions from Company funds without authorization from the CEO.

Contributions made by Outpost24 to community projects or charities need to be made in good faith and in compliance with our policies and procedures.

## **Books, Records and Internal Control Requirements**

Expenses must never be hidden or purposefully misclassified and they should be able to pass an external audit. To ensure this, international anti-corruption laws generally require detailed and accurate accounting records for transactions, including cash and bank accounts. We must ensure we maintain accurate books, records and financial reporting, incl. a defined approval and controlling system to be applied on the financial records.

## **You Are Responsible**

Outpost24 takes corruption and bribery very seriously. Any violation of this policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action, including termination, consistent with local law.

Bribery is a criminal offense. As an employee you will be accountable whether you pay a bribe yourself or whether you authorize, assist, or conspire with someone else to violate an anti-corruption or anti-bribery law. Punishment for violating the law are against you as an individual and may include imprisonment, probation, mandated community service and significant monetary fines which will not be paid by Outpost24.

## **Questions or How to Raise a Concern**

If you want to ask a question about the requirements in this policy or are concerned that an anti-corruption violation is occurring or has occurred, report it immediately to the Legal Department.

## **Policy Ownership**

This Policy is owned by Outpost24's Legal Department. Please contact your Legal Department, if any doubt or questions.