

# Anti Bribery and Anti Corruption Policy

## Purpose of the Anti-Bribery and Anti-Corruption Policy

Outpost24 makes their best effort to adhere to legal restrictions in a broad sense, this also includes bribery and corruption laws.

Accordingly, this policy outlines acceptable and non-acceptable behaviours to ensure compliance with among other anticorruption laws. The policy also exemplifies Outpost24's commitment to create a high standard of business practices, whilst maintaining professionalism and objectivism.

Outpost24 is dedicated to upholding both the US FCPA Anti-Bribery Provisions and UK Bribery Act, to ensure that the act of bribery is deemed just severe as the receipt of a bribe.

The Anti-bribery Policy also ensures that all employees of Outpost24 understand the severability of bribery and the consequences of such actions, both for the employee and the company. At Outpost24 we strive to live out our values, which entails transparency in all areas of business and providing our customers and employees with clear and concise information on our stance on bribery and corruption.

## Definitions

To understand the value of the Anti-bribery policy, it is important to understand what we as a company are trying to eliminate:

In the context of this policy, a bribe is 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 is 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.

A facilitation payment is a small sum paid to government officials to facilitate or expedite routing. Nondiscretionary government actions are considered facilitation payment.

Lastly the definition of kickbacks, is the return of a sum already paid or due as a reward for awarding of furthering business.

## Typical Areas of Bribery

There are some areas of business where corruption, including bribery, will be most prevalent. These areas include, but are not limited to:

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

## 1. Gifts, Entertainment and Hospitality

Gifts are defined broadly and can be anything of value given or received from another person or business, in connection with Outpost24's business.

The term includes presents, discounted materials goods, including materials for marketing purposes. It also includes payments, gratuities and discounts. Entertainment and Hospitality is also defined broadly, and means any accommodations, travels or travel expenses, meals, trips, or tickets for a variety of experiences.

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

When assessing if the given/received is a gift, entertainment and/or hospitality can be classified as a bribe, the following criteria must be evaluated:

- Is the intent to build a relationship or is there a corrupt intent?
- The frequency for which gifts have been given, and if the frequency is timed with other events, such as negotiations or contracts discussions.
- Can the details of the transaction stand for public scrutiny?
- If we are the giving party, how would we perceive it if we were the receiving party?
- Are there any legitimate reasons for the giving/receiving of the gift?

If any of the above questions, create doubt as to the interpretation, in a given situation, please contact the Legal Department at [legal@outpost24.com](mailto:legal@outpost24.com).

### What is an acceptable gift?

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

All gifts of non-insignificant value received or given must be communicated to the Legal Department for compliancy purposes.

Failure to comply with this policy, will result in Outpost24 taking disciplinary actions.

## 2. Facilitation Payments

Facilitation payments are prohibited and if you are in doubt whether a payment could be regarded as such, please contact the Legal Department for clarification.

Any attempt to improperly influence a public official, with payments/gifts/hospitality etc., will be deemed as a facility payment, and thereby a violation of this policy.

Therefore, is important that extreme caution is being taken, when receiving/giving gifts to a public official- Any and all gifts offered to or provided by a public officials shall be communicated to the Legal Department, regardless of their size or value.

## 3. Procurement Process

All employees 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.

Outpost24 is committed to have suppliers that deliver the best services, at the best price based on a fair competition and we are dedicated to upholding the European Union Public Sector and Utilities Procurement directives, amongst others.

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

No employee of Outpost24 is allowed to make political contributions from Company funds without authorization from the CEO.

Contributions made by Outpost24 to community projects or charities must be made in good faith and in compliance with our policies and procedures. This involves the notification and acceptance of the charity by the Legal Department.

##### *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 ensure that we maintain accurate books, records and financial reporting, incl. a defined approval and controlling system to be applied on the financial records.

##### *Responsibility and consequences*

Outpost24 takes corruption and bribery extremely seriously. A violation of relevant anti-corruption laws can lead to severe civil and criminal penalties and reputational harm to Outpost24.

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. Any employee will be held accountable whether they receive or pay a bribe or if they authorize, assist, or conspire with someone else to violate an anti-corruption or anti-bribery law. Punishments for violating the law are against the employee as an individual and may include imprisonment, probation, mandated community service and significant monetary fines, which will not be paid by Outpost24.

##### *Training*

All employees must complete our anti-bribery course, as a part of their onboarding process when hired at Outpost24. This training is then repeated annually, at a set time, to ensure that all employees are refreshed on the laws and principles of anti-bribery and anti-corruption and our internal policy regarding bribery.

Failure to complete the training will lead to disciplinary action.

#### **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 anticorruption 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.