



Korkia Anti-corruption and Anti-bribery Policy

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1. Introduction & Basis of the Korkia Anti-Corruption and Anti-Bribery Policy

This is the Korkia Anti-Corruption and Anti-Bribery Policy (later "Policy") of Korkia Oy and all its affiliated companies globally ("later Korkia") and has been approved by Korkia's Board of Directors on August 31st 2023.

Korkia Code of Conduct creates the basis for Korkia Oy's and its subsidiaries' ethical business activities. Korkia is committed to compliance with this Policy, anti-corruption and anti-bribery laws and does not accept any form of Corruption or Bribery in any form.

The purpose of this Policy is to prevent and detect Corruption and Bribery.

BASIS & SCOPE

Korkia, its management, board members and all its employees are responsible for complying with this Policy and anti-corruption and anti-bribery laws as well as the ethical and business standards outlined in the Korkia Code of Conduct.

This Policy applies to all employees and people working for Korkia regardless of their level, location or employment type (whether permanent, temporary, or fixed-term, and including trainees, freelancers, agency workers and other hired personnel).

Korkia requires that its business partners are committed or commit to anti-corruption and anti-bribery compliance and maintain the highest level of anti-corruption practices.

Team Leads and managers have a responsibility to ensure that the Policy is known and conformed to by all employees within their area of responsibility, and to lead by example.

As a Korkia employee, you are expected to

- > be familiar with, ask if something is unclear, and comply with this Policy
- > ask for advice from Legal or Compliance whenever in doubt about the right course of action
- > report any potential violations immediately

2. Definitions

Corruption

- Means the abuse of power to obtain an undue advantage, money, or other personal gain.
- The abuse of power means power, ability, or position to prepare, make decisions or influence another actor's action, decision, behavior, or opinion.
- The abuse of power can be illegal or otherwise unethical.

Bribe

- Means offering, promising, and/or giving anything of value to improperly influence another in order to obtain business or some other commercial advantage.
- Means requesting and/or accepting anything of value as a reward for or as an inducement to act improperly in relation to the awarding of business.
- 'Anything of value' must be broadly understood and can include cash, any payment, discount gift, benefit as well as anything that can have value to the receiver.

Facilitation payment

- Means payments to authorities, public officials, political parties, or other official parties to speed up or otherwise facilitate normal official routines such as applying for permits, licenses, or other official documents that the official is already required to perform.
- Facilitation payment is considered a bribe in many countries and is one form of corruption.

Kickback

- Are illegal payments used as compensation for e.g. special treatment and can take form of cash.
- Kickbacks are one form of bribery.

Hospitality

- Means e.g. dining, events (e.g. tickets to a sporting event, concert or to the conference), drinks, accommodation, flights or similar.

3. Corruption and Bribes

Korkia have zero tolerance policy for and prohibits all forms of Corruption and Bribery. Each employee, management and board members must adopt a zero-tolerance policy toward all forms of Corruption, including Bribery, Kickbacks and Facilitation payments.

To avoid Corruption and Bribery, it is strictly forbidden to:

- engage in activities that could facilitate any forms of Corruption;
- offer/give/promise or receive/request/accept a Bribe of any kind either directly or indirectly to or from government officials or private persons;
- offer or accept Facilitation payments or Kickbacks in any form either directly or through third parties.

4. Hospitality and Gifts

Hospitality or gifts are allowed only then they are minor of value and must always be appropriate type and have a valid business purpose.

Acceptable gifts and Hospitality:

- there is a legitimate business purpose and are given/received with consideration;
- are given or received openly without obligations and/or expectations;
- are given or received in good faith and in accordance with this Policy, and other Korkia policies and applicable legislation.

It is strictly forbidden to accept or offer gifts or any kind of Hospitality if it;

- could affect or appear to affect either party independence or impartiality;
- create or appear to create conflicts of interest;
- exceed normal and reasonable practice in the industry;
- is offered or accepted with conditions or expectation of a return favour, i.e. reciprocity;
- is in the form of cash or an equivalent benefit;
- is frequent; or
- endanger trust in Korkia's operations.

The maximum value of any given or accepted gift is EUR 50. The maximum amount is annually EUR 250 if received from or given to the same party.

The maximum value for any given or accepted hospitality is EUR 100. The maximum amount is annually EUR 500 if received from or given to the same party.

Gifts or Hospitality that exceed the maximum amounts must be reported and approved by Team Lead and the Compliance Officer. Gifts or Hospitality that exceed the maximum amounts must be recorded to the Gifts Register.

The maximum values for hospitality and the process of reporting and approval of exceeding values does not apply to ordinary business

lunches and dinners for and from business partners.

5. Reporting

Korkia views Corruption and Bribery very seriously and all potential violations of this Policy or applicable legislation or regulations must be reported immediately to our anonymous Whistleblowing channel (subject to its own instructions).

All reports are investigated professionally, confidentially and without undue delay, and action taken to resolve the reported matter.

Whenever in doubt, ask for guidance by contacting:

- > The Compliance Officer
- > Legal

6. Training

Korkia provides anti-corruption and anti-bribery training yearly.