



# ANTI CORRUPTION POLICY

## TABLE OF CONTENTS

1.	PURPOSE AND SCOPE.....	2
2.	COMPLIANCE WITH ANTI-CORRUPTION LAWS IS MANDATORY AND THE PERSONAL RESPONSIBILITY OF EVERY EMPLOYEE.....	2
3.	“BENEFITS” .....	3
4.	PROVISION OF BENEFITS IN GENERAL .....	3
5.	BENEFITS TO PUBLIC OFFICIALS .....	5
6.	BENEFITS TO PERSONS OTHER THAN PUBLIC OFFICIALS.....	6
7.	ACCEPTING BENEFITS .....	6
8.	SELECTION AND MONITORING OF REPRESENTATIVES .....	8
9.	POLITICAL CONTRIBUTIONS .....	9
10.	DONATIONS .....	9
11.	SPONSORING .....	10
12.	LOCAL ANTI-CORRUPTION LAW MAY BE STRICTER.....	10
13.	QUESTIONS .....	10
14.	REPORTING OF VIOLATIONS AND ACTIONS UPON NOTIFICATION .....	11
15.	EFFECTIVE DATE.....	11
	ANNEX 1 OVERVIEW OF THE APPROVAL REQUIREMENTS FOR BENEFITS.....	12
	ANNEX 2 BENEFIT APPROVAL REQUEST FORM .....	13
	ANNEX 3 RED FLAGS.....	15

## **1. Purpose and Scope**

It is one of the fundamental principles of the Arvos Bidco S.à.r.l. and its subsidiaries and companies of which it owns directly or indirectly the majority of shares or voting rights (“**ARVOS**”) to observe strictly all national and international anti-corruption laws and regulations. Anti-corruption laws and regulations are designed to prevent corruption and ensure fair competition. Compliance with anti-corruption laws and regulations is of significant importance for the reputation of ARVOS as a business partner committed to fair competition. ARVOS competes fiercely for business by the quality and price of its products and services, but not by offering improper advantages or benefits to others.

The Anti-Corruption Policy (“**Policy**”) has been effective since June 2015 and this revised version is effective at the time indicated and binding on all directors, officers and employees of ARVOS (“**Employees**”). Third parties representing ARVOS (such as agents, sales representatives, distributors, consultants and other Qualified Business Partners as set out in the ARVOS Business Partner Policy) must, as a prerequisite to their engagement, agree to represent ARVOS in a manner consistent with the Policy as well as all applicable laws and regulations.

The Policy sets forth the anti-corruption rules defined by ARVOS to ensure that ARVOS and its Employees are always regarded as a respected business partner. All Employees and third parties representing ARVOS must comply strictly with the rules set forth in the Policy and all applicable laws and regulations concerning corruption or bribery, whichever are more restrictive.

The table in **Annex 1** summarizes the main approval requirements for the granting and receipt of Benefits. However, it does not replace the detailed provisions in this Policy nor locally more restrictive requirements imposed by your Compliance Officer in conjunction with the respective Managing Director (“**MD**”), if any.

## **2. Compliance with Anti-Corruption Laws is Mandatory and the Personal Responsibility of Every Employee**

It is the unconditional policy of ARVOS to comply fully with all applicable anti-corruption laws and regulations worldwide and to enforce strict compliance throughout ARVOS.

Each Employee must be familiar with and observe strictly the anti-corruption rules set forth in the Policy and the anti-corruption or anti-bribery laws of the locality in which he/she is operating or which are affected by his/her operations. Each Employee is held *personally* responsible to comply fully with the rules set forth in the Policy and the relevant specific anti-corruption or anti-bribery laws.

Non-compliance will be taken very seriously by the management of ARVOS and could lead to personal legal consequences for the relevant Employee. ARVOS has a “**zero tolerance**” for any violation of anti-corruption laws or regulations. This means that any and all violations of this Policy will result in corrective counseling up to and including termination of employment for cause, compensation for damages incurred, and criminal prosecution by the local authorities (if appropriate).

### 3. “Benefits”

The term “**Benefit**” as used herein, unless otherwise specified in more detail, shall mean anything of (material or immaterial) value, including, but not limited to, cash and cash equivalents (like checks, loans, moratoriums, waivers of debt), personal discounts and price reductions not generally available, gifts, invitations to cultural or sportive events, favors, use of facilities, material or equipment, drinks (alcoholic and non-alcoholic), meals, transportation (by any means), lodging, and/or promise of future employment as well as any kind of sexual benefit. In sum, it means any “**gifts**” or “**hospitality**,” which are not deemed of an absolute minor relevance like standard snacks or coffee/tea at a business meeting. When calculating the value of a Benefit, use the actual, non-discounted, and standard cost to purchase or acquire the Benefit.

### 4. Provision of Benefits in General

No Employee may, directly or indirectly, offer, promise, grant, authorize or approve the giving of any Benefit to any person to influence his or her decision making, to obtain an advantage in return or to give a consideration for a past or future advantage. This applies irrespective of whether such advantage has been or will be legal or illegal. Moreover, to ensure the high reputation of ARVOS, provision of Benefits also are prohibited if the respective Benefit might cause the appearance of impropriety or give *impression* that it is intended to influence the decision of a person, or to obtain an advantage or to give a consideration for a past or future advantage.

No Employee shall provide any Benefit to a third party acting as an intermediary (such as an “agent” or “consultant”) while knowing or having reasons to know (*i.e.*, a reasonable person would know) that any part of the Benefit will be used for granting or promising a Benefit. Therefore, all payments to agents, consultants and similar persons must be made by wire transfer or check (never in cash; *cash payments are prohibited*) and the amount of payment must not exceed the market-based amount normally paid for the legitimate kind of service. All agents, consultants and similar persons having a business relationship with ARVOS shall be bound by the provisions of this Policy (see Section 8 below) and the ARVOS Business Partner Policy for registering, approving and working with **Qualified Business Partners**.

According to the UK Bribery Act 2010 and the Foreign Corrupt Practices Act (“**FCPA**”) and most national laws of European countries (signatories of the OECD Anti-Bribery Convention<sup>1</sup>), the provision of a Benefit can be prosecuted and judged in the UK and/or the U.S. and respective European countries, even if it takes place outside of the country. The basis for this is only a minor or indirect connection between the offense and the law enacting country (such as the nationality of the granting or receiving person or the localization of an email server or phone lines).

Sales and promotion items branded with the Company logo (like calendars, appointment books, mouse pads, coffee mugs, pens, etc.) normally have a low value well below the above thresholds and, if so, no prior approval is necessary. For the avoidance of doubt, unless there are extraordinary circumstances, the giving of normal sales promotion, branded items are permitted without prior written approval. However, as a matter of principle, sales promotion items should not be given to the same person more than twice a year, and, for the sake of transparency, sales promotion items shall not be mailed or delivered to the recipient’s home.

---

<sup>1</sup> <https://www.oecd.org/gov/ethics/2406452.pdf>.

# ARVOS POLICY

## ANTI CORRUPTION POLICY

May 2024

With regard to the threshold Benefit values set forth below, in exceptional cases, the cost of a business meal could potentially exceed **EUR 75** (or the equivalent thereof in local currency) per person. If the Employee, prior to the event, expects or has reason to expect that the cost for a business meal may exceed this threshold, he/she must ask the local Compliance Officer or the Chief Compliance Officer of ARVOS for prior written approval. If the cost *unexpectedly* exceeds this threshold, the Employee must inform the Compliance Officer after the meal, in writing, without undue delay and explain why the threshold could not be kept, but in any event, prior to submitting the expense for reimbursement.

All entries in the Benefit Approval Request Form (Annex 2) include: (i) the full names of the participants; (ii) the correct names of the companies represented by the participants; (iii) the reason for the invitation; (iv) the location and date of invitation; and (v) the anticipated cost of the hospitality. **All questions on the Benefit Approval Request Form must be answered.**

**Consistent with the requirements in Sections 5 and 6 below, for the provision of a Benefit to a Public Official or to persons other than Public Officials, the advanced written approval is required for the Employee to include in his/her submission to be eligible for reimbursement for the expenditure. In other words, other than in the rare exceptions as defined therein<sup>2</sup>, if an expense (requiring approval) is not approved in advance as set out herein, then the Employee shall not be entitled to reimbursement for the cost of the Benefit and shall be in violation of this Policy.**

Traveling cost of a prospective or current business partner, customer, or their employees must be borne by the relevant invitee (or his/her company), not by ARVOS. Paying for or reimbursing such cost might be viewed as an attempt of ARVOS to gain an unfair business advantage. Rare exceptions are conceivable, but always require the prior approval of your Compliance Officer in writing.

Granting Benefits during, or within proximity to (either reasonably before or after) *on-going or upcoming negotiations* with a prospective or current business partner or customer or their employees are never permitted – regardless of value, unless expressly approved by your Compliance Officer in advance in writing, or by email.

Granting Benefits consisting of cash or cash equivalents (for example, checks, loans, moratoriums, waivers of debt) and granting Benefits of or with a sexual or immoral nature are in no event permitted.

No Employee shall provide any Benefit to a *third party* acting as an intermediary (e.g., “agent” or “consultant”) while “**knowing**” that all or part of the Benefit will be used for granting or promising a Benefit to a person to induce that person to, or reward that person for, an improper performance of his/her relevant function. The term “**knowing**” also includes such situations in which the Employee should have known or showed “gross negligence,” “willful blindness” or “deliberate ignorance” to circumstances which make it likely or even possible that the intermediary grants a Benefit to a person to induce to or reward for an improper performance of the relevant person’s function. A function is performed “*improperly*” if the person performs the function in breach of what would be expected from him/her by a reasonable person by reference to any applicable requirements of good faith, impartiality or any position of trust which that person may hold.

---

<sup>2</sup> There may be rare exceptions for the provision of food or drink (but not gifts) that occur spontaneously and do not allow for the prior written approval. In those instances, approval must be obtained with a detailed, written explanation as soon as possible after the event, but in any event, prior to reimbursement for the expenditure.

## 5. Benefits to Public Officials

Bribery of public officials is prohibited in all of the countries in which ARVOS operates but in addition is a crime. By bribing public officials ARVOS, would be exposed to high fines and the involved persons would be subject to criminal prosecution.<sup>3</sup>

The term “**Public Official**” as used herein is broadly defined and includes:

- any officer, employee or representative of, or any person otherwise acting in an official capacity for or on behalf of a Governmental Authority (for the purposes of the Policy, the term “Governmental Authority” includes any national or local governmental institutions, associations, enterprises or companies owned or controlled by governments (such as state-owned utilities or enterprises), and any supra-national or crown corporation organizations);
- any political party and any officer of, or individual who holds a position in, a political party, and any candidate for political office; and
- any person who otherwise exercises a public function or task for or on behalf of any country or public body.

In practice, this can include civil servants, inspectors, members of a political party, employees of a state university, judges, customs and immigration officials, ambassadors and embassy staff, and law enforcement personnel *as well as any employee of any utility that is owned or controlled in whole or part by the government, e.g., most of our customers in China or any other country with a state owned or controlled economy.* The prohibition to offer, promise, grant, authorize or approve any Benefit to Public Officials extends also to Benefits to members of the family of the Public Official and to other *third parties* connected with, or related to, a Public Official.

Furthermore, the prohibition also extends to so-called **facilitation payments**. A facilitation payment is an unofficial payment to encourage the recipient or a third party to perform his/her existing obligation or role or expedite or refrain from performing a routine task he/she may otherwise be obligated to do. This can be payments to perform a routine task such as obtaining a permit, license or other official document and processing governmental papers (such as visas or work orders). Facilitation payments are still forbidden even if they are small or if they may be expected or customary.

Except as provided below, to ensure strict compliance of ARVOS with the rules of bribery of Public Officials, **any Benefit** offered, promised or granted to a Public Official (or to a closely connected person) requires the *prior* (see footnote 2) written approval of the respective Compliance Officer. The Compliance Officer, for example, may approve the Benefit if the supervisor of a Public Official has given his/her written consent within the frame of its authority that the Public Official may accept the Benefit.

To the extent in compliance with the above, an Employee may only provide a Benefit to a Public Official, if and when:

- the Public Official has confirmed, after being asked, that he is allowed to accept the Benefit;
- the price is reasonable and the value of 50 EUR per person (or the equivalent thereof in local currency) is not planned to be exceeded;

---

<sup>3</sup> See for example in Germany: §§ 333, 334 Criminal Code (“Strafgesetzbuch”), in the USA: 15 U.S. Code § 78dd-1, et seq. (the “Foreign Corrupt Practices Act” [FCPA]), specifically, § 78 dd-2(g) and 78 dd-3(e), in China: Article 389 and 393 of the PRC Criminal Law, in Japan: Article 198 of the Penal Code, Poland: Articles 228 – 230a of the Penal Code; Czech Republic: Article 331 of the Criminal Code and Australia: Section 70.2 of the Criminal Code Act 1995.

- there is a valid business purpose for the Benefit;
- the spouse, family or any relative of the Public Official is not included;
- the Benefit has been offered in good faith and conforms to local business courtesy customs;
- the Benefit cannot be seen as bribery under normal circumstances; and
- it has been approved by the Compliance Officer in writing or via email.

## **6. Benefits to Persons other than Public Officials**

While bribing a Public Official constitutes a crime in all jurisdictions, commercial bribery, *i.e.*, granting a Benefit to persons other than Public Officials, might be viewed less strictly in various jurisdictions. Nevertheless, commercial bribery is forbidden and constitutes a crime in most jurisdictions where ARVOS operates<sup>4</sup> and also is prohibited by this Policy.

Irrespective of how commercial bribery is qualified in the various jurisdictions, ARVOS is committed to the principles of fair competition, which include competing for business by price and quality of the products and services and not by improper Benefits to others.

Benefits to persons other than Public Officials require the prior written approval of your Compliance Officer if:

- the value of the Benefit exceeds EUR 75 per person or if the value of all Benefits to the same person exceeds EUR 150 in one year (or the equivalent thereof in local currency);
- the Benefit might appear to be offered, promised, granted, authorized or approved to gain an unfair business advantage; or
- the Benefit might not clearly correspond to courtesy, meet local customs or might not be socially acceptable.

## **7. Accepting Benefits**

Fair competition and the reputation of ARVOS also are impaired if an Employee of ARVOS asks for or accepts a Benefit which gives the appearance that he/she might be able to be induced to or is rewarded for an improper decision or performance.

Therefore, except as provided below, no Employee may use his/her job to, directly or indirectly, solicit, ask, demand, accept or be promised any Benefit for himself/herself or any person related to him/her from any person (including suppliers, customers or competitors of ARVOS). Moreover, each Employee must avoid any action which might give the *appearance that* the Employee is soliciting, asking, demanding, accepting or being promised a Benefit.

Employees may accept a Benefit only, if:

- the value of the Benefit does not exceed EUR 75 and the value of all Benefits from the same person or company does not exceed EUR 150 in one year (or the equivalent thereof in local currency);
- the Benefit is not granted (and does not appear to be granted) by the donor to reward an improper performance of the Employee's function;
- the donor does not expect (and does not appear to expect) to induce the Employee to an improper

---

<sup>4</sup> Germany: § 299 Criminal Code; USA: United States Code, Chapter 18, Section 1952 and State Criminal Codes, Czech Republic: Sections 331 and 332 of the Czech Criminal Code; Poland: Article 296a of the Penal Code; Japan: Article 967 of the Companies Act; China: Article 164 of the PRC Criminal Law and Australia: Section 249B of the New South Wales Crimes Act 1900 and other State Criminal Codes.

# ARVOS POLICY

## ANTI CORRUPTION POLICY

May 2024

performance of his/her function (in particular the Benefit is not granted during on-going or upcoming negotiations with the (prospective) business partner);

- the Benefit corresponds to courtesy, meets local customs, and is socially acceptable; and
- the acceptance complies with the relevant statutory laws and regulations.

Benefits which exceed the value of EUR 75 or EUR 150, respectively (or the equivalent thereof in local currency) or which do not meet the other above-mentioned requirements must be refused or returned by the Employee. If the refusal or return is likely to insult or embarrass the donor or is not possible or socially not acceptable for other reasons, the Employee may accept the Benefit, but must promptly inform the Compliance Officer of ARVOS. The Compliance Officer will then decide whether the Employee may retain the Benefit or what to do with the Benefit (for example, to use the Benefit for a charitable disposition).

Employees may accept the *invitation to an ordinary business meal*, if:

- the meal has a clear business purpose;
- the meal is reasonable in cost (as a rule of thumb: does not exceed the value of EUR 50 (or the equivalent thereof in local currency) per person);
- the invitation is reasonable in frequency (as a rule of thumb: the Employee has not been invited by the same person or company more than twice a year);
- the invitation meets local customs and is socially acceptable, in particular, the relevant location does not offer the possibility of sexual interaction; and
- the invitation is in line with applicable statutory laws and regulations.

If it turns out during the meal that the cost exceeds the value of EUR 75 (or the equivalent thereof in local currency) per person, the Employee is expected to share the bill. This sharing should be justified by pointing out the rule of ARVOS' Policy.

If there are on-going or upcoming negotiations with the (prospective) business partner, Employees should be reluctant to accept any invitation to a business meal.

Costs for business travel and accommodation of ARVOS-Employees shall always be borne by ARVOS according to the relevant travel guidelines. This also applies to costs for travel to a cultural or sportive event to which an Employee might be invited (including transportation to the event, lodging for an event and meals not directly provided in conjunction with the event).

If a business partner provides "in-house" accommodation, the Employee should determine the fair market value, make the appropriate payment to the business partner, and arrange for reimbursement via the expense report. If a reimbursement is likely to insult or embarrass the business partner or is not possible for other reasons, the Employee must promptly inform their Compliance Officer, who will then decide on any steps which may be necessary.

In all cases of accepting Benefits the following shall apply:

- Local Anti-Corruption Laws shall always be abided by, especially if they are stricter than provisions contained in this Policy;
- Employees may take advantage of discounts and other promotions offered by suppliers, customers or other business partners of ARVOS, if (and only if) such discounts or promotions are available to all Employees of ARVOS or solely benefit the ARVOS legal entity and not the individual; and
- Benefits must not be accepted during, or in proximity to (either a time that is reasonably before or after), on-going or upcoming negotiations with a (prospective) business partner or customer –



# ARVOS POLICY

## ANTI CORRUPTION POLICY

May 2024

independent from their value, unless expressly permitted by your Compliance Officer beforehand. An exception to this strict principle applies to the invitation to a business meal or drink, provided the invitation meets the above-mentioned requirements.

*The Compliance Officer, in his or her sole discretion, may impose more strict requirements in specific situations or generally, including barring the receipt of any Benefits from a supplier or potential supplier.*

Approval requests to or information of your Compliance Officer in accordance this Policy must contain the following information: (i) kind of Benefit; (ii) estimated value; (iii) name and position of the donor; (iv) company of the donor; (v) relationship between the Employee and donor; and (vi) time and place of receipt or disposal.

## 8. Selection and Monitoring of Representatives

Representatives (*i.e.*, **Qualified Business Partners**) of ARVOS (such as agents, distributors, sales representatives, consultants acting for or on behalf of ARVOS) ("**Representatives**") must represent ARVOS in a manner consistent with this Policy as well as with all applicable laws and regulations.

All agreements with a Representative must contain a written confirmation of the Representative that:

- the Representative has received a copy of this ARVOS Anti-Corruption Policy;
- he/she will abide by that Policy and all applicable anti-corruption laws and regulations;
- ARVOS is entitled to terminate the agreement for cause if the Representative is in breach of this obligation; and
- ARVOS is entitled to monitor and audit such compliance.

Before selecting a Representative (*e.g.*, agent, reseller, Business Partner, etc.), the respective Employee must conduct due diligence in order to determine the commitment of the (prospective) Representative to legal and ethical business practices. In order to comply with these requirements ARVOS has enacted a Business Partner Policy which requires that, in certain cases, a third-party due diligence must be conducted. Please work with your Compliance Officer in order to complete such third-party due diligence and consult the ARVOS

Business Partner Policy to follow the additional requirements in that document. Any behavior which may raise the slightest concern from the perspective of an objective third party that the (prospective)

A Representative who engages in illegal or unethical business behavior will not be considered as an appropriate business partner of ARVOS.

To facilitate the selection process and the later monitoring process of the (prospective) Representative, a list of "Red Flags" is set forth in **Annex 3**. In case one or more of these Red Flags shows up, each Employee should be warned with respect to entering into or continuing a business relationship with the respective person. In any such case, the Employee should investigate further in order to ensure that the respective person meets the integrity requirements of a Representative in accordance with the ARVOS Business Partner Policy. If any of the Red Flags are present, then you must consult with your Compliance Officer prior to engaging such Representative.

*All Representatives must be approved prior to engagement. Please work with your Compliance Officer to confirm that this has been completed.*



## **9. Political Contributions**

Political contributions mean contributions of anything of value to support a political goal. Examples include local, regional or national political funds raising events, providing goods or services to a political party or candidate for a political office, paying employees during working hours to work at a political function, or paying for political campaign expenses.

Political contributions by companies are illegal in many countries and exposed to abuse. Therefore, each political contribution by or on behalf of ARVOS requires a written prior approval by the Executive Board of ARVOS.

No direct or indirect pressure in any form may be directed toward any Employee to make a *personal* political contribution or to participate in the support of a political party or the political candidacy of any individual. The Employee, however, if he or she chooses to make a personal contribution, has to ensure that he/she does not represent himself/herself in any way as representative of ARVOS in connection with such personal activities.

## **10. Donations**

Donations are voluntary contributions in money or kind without consideration (*i.e.*, where ARVOS is not paid and does not receive anything tangible in return) to third parties for educational, scientific, environmental, cultural or social purposes. Political donations are not permitted.

In order to avoid any misuse, each donation must comply cumulatively with the following requirements –

- Each donation must be clear and visible. This means in particular: the identity of the recipient and the planned use of the contribution must be clear and plausible and its purpose must be justifiable. The identity of the recipient and planned use and purpose of the donation must be properly documented.
- Donations must not be made to secure inappropriate competitive advantages for ARVOS or for improper purposes.
- Donations must not be made for political or religious purposes (for example, donations to politicians, political parties, churches or priests).
- Donations must not be made to individuals or to profit organizations.
- Donations must not be paid to any private accounts.
- Each donation must be signed off by the respective Business Unit head of ARVOS.
- The Compliance Officer must be informed in advance about every donation in writing.
- Donations in excess of EUR 10,000 to the same recipient must be signed off first by the Division President and then by the Executive Board.

To the extent applicable under local law, donations must be made in a form that ensures their tax deductibility (*e.g.*, against donation receipt).

## **11. Sponsoring**

Sponsoring activities mean any contribution in money or in kind by ARVOS towards an event organized by a third party or a sports team in return for the opportunity to display ARVOS' logo, advertise ARVOS' brands, being mentioned in the opening or closing addresses or on a website, or the participation of a speaker on a discussion panel, as well as tickets to the event.

Each sponsoring activity must comply cumulatively with the following requirements –

# ARVOS POLICY

## ANTI CORRUPTION POLICY

May 2024

- A written sponsoring agreement reviewed by Legal must be concluded. The agreement must specify the name and address of the recipient, its banking details, the exact amount of the contribution, the event for which the funds are given and the consideration which ARVOS will receive in return.
- The sponsoring must be justified by a legitimate and plausible business purpose; it must not be made to secure an inappropriate competitive advantage for ARVOS.
- The contribution offered by ARVOS must be proportionate to the consideration ARVOS receives in return.
- Each sponsoring contribution must be signed off by the respective Business Unit head of ARVOS.
- The Compliance Officer must be informed about every sponsoring contribution in excess of EUR 1,000.
- Any sponsoring contribution in excess of EUR 10,000 to the same recipient must be signed off first by the Division President and then by the Executive Board.

### 12. Local Anti-Corruption Law May Be Stricter

Each Employee has the continuing obligation to be familiar with the relevant anti-corruption and anti-bribery laws and regulations. In case this Policy is less strict than the relevant anti-corruption or anti-bribery laws and regulations in a jurisdiction, the stricter anti-corruption or anti-bribery laws and regulations shall prevail. In case the Policy is stricter, the Policy shall prevail; the words of the Policy shall prevail over any annex.

### 13. Questions

If an Employee has any question regarding the Policy, he/she is encouraged to refer the question to the Local Compliance Officer or of the Chief Compliance Officer.

### 14. Reporting of Violations and Actions upon Notification

Each Employee who knows or has good reason to believe that this Policy or the relevant anti-corruption or anti-bribery laws have been violated is encouraged to bring this matter to the attention of your Compliance Officer either directly or via the internet-based Whistleblowing System.

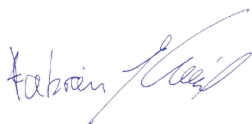
Upon request, the identity of the Employee who makes a report in good faith will be kept confidential. ARVOS will not tolerate retaliation against anyone who has reported a suspected violation in good faith.

Each report of a suspected violation will be investigated without undue delay. If a violation has been confirmed, it is the responsibility of the supervisor to take – after consultation with your Compliance Officer – appropriate action against the relevant Employee.

### 15. Effective Date

This revised Policy is effective and binding on all directors, officers and employees of ARVOS as of May 1<sup>st</sup>, 2024 and replaces the Policy of July 2019.

Luxemburg, April 30<sup>th</sup>, 2024



Fabian Immink



Karsten Stückrath

Randolph R. Mossing

Randolph Mossing

### ANNEX 1

### OVERVIEW OF THE APPROVAL REQUIREMENTS FOR BENEFITS

	Approval by Division Head	Approval by your Compliance Officer	Approval by the Executive Board
Benefits to Public Officials (with the exception of business meals or drinks brought into a Company office)		Yes, irrespective of value	
Benefits to persons other than Public Officials <u>up to</u> a value of 75 EUR (with the exception of the cases mentioned below for which specific approval requirements apply)		No (provided that all other requirements have been met)	
Benefits to persons other than Public Officials <u>exceeding</u> a value of 75 EUR (with the exception of the cases mentioned below for which specific approval requirements apply)		Yes	
Reimbursement of travel costs of persons other than Public Officials		Yes, irrespective of value	
Granting of Benefits in connection with ongoing or upcoming negotiations		Yes, irrespective of value	
Gifts of money or valuables	Not permitted	Not permitted	Not permitted
Accepting Benefits		Yes, if it exceeds EUR 75	
Benefits of or with a sexual or immoral nature	Not permitted	Not permitted	Not permitted
Political Contributions			Yes, irrespective of value
Donations	Yes	No, but must be informed if exceeding 1,000 EUR	Yes, if exceeding 10,000 EUR
Sponsoring	Yes	No, but must be informed if exceeding 1,000 EUR	Yes, if exceeding 10,000 EUR

# ARVOS POLICY

ANTI CORRUPTION POLICY

LJUNGSTRÖM Version

March 2024

## ANNEX 2

### BENEFIT APPROVAL REQUEST FORM

<input type="checkbox"/> CORPORATE	<input type="checkbox"/> SCHMIDTSCHES SCHACK	<input type="checkbox"/> LJUNGSTRÖM
------------------------------------	--	-------------------------------------

#### PURPOSE

<input type="checkbox"/> Benefit to Public Officials	<input type="checkbox"/> Benefit to Non-Public Officials	<input type="checkbox"/> Accepting Benefit
--	--	--

#### ANTRAGSTELLER

ARVOS Unit Name:	
Name and Function of Applicant:	

#### INFORMATION OF BENEFIT

Expected market value of Benefit (in €)	
Specify the type of Benefit (meal, drink, gift, entertainment, event etc.)	
Relationship of the parties, including any upcoming contract negotiation, frequent provider etc.	
In case of events or entertainment that you are receiving, will the person giving the Benefit be present at the event?	
In case of events or entertainment that you are receiving, will any non-employee members of your family (or friends of yours) be attending the event with you? If so, please name and identify the relationship.	
Number of occasions this party has received Benefits or you have received Benefits within the current fiscal year (April 1 – March 31) and the total amounts of those Benefits.	

#### JUSTIFICATION AND PURPOSE FOR BENEFIT

--

SIGNATORY		
	Name	Date
Employee		
Supervisor		
MD		
Compliance Officer		

**ANNEX 3**  
**RED FLAGS**

Each Employee should be careful, if the (prospective) Business Partner:

- refuses to confirm to be bound by the Anti-Corruption Policy of ARVOS and to abide by the relevant anti-corruption laws and regulations;
- is located in a country with a reputation for high corruption and bribery (according to the Corruption Perception Index of Transparency International under <https://www.transparency.org/en/cpi/2023>);
- works in an industry that has a history of corruption problems;
- has a principal that is, or is related to, a Public Official,
- refuses to disclose its ownership or provides documents that conceal the true identification of a representative or agent;
- conducts over-invoicing, issues false invoices, records payment to a wrong payee, or provides payment descriptions that do not correspond to the appropriate account;
- requires payment to unrecorded accounts or holds miscellaneous accounts that can be used to hide improper payments;
- provides travel and expense forms with incomplete or inaccurate information;
- refuses an audit or recertification,
- has been recommended by a Public Official, customer, prospective customer or by someone on the basis of the Business Partner's "friends in high places";
- does not appear to be qualified to perform the duties for which the Business Partner is engaged to assist ARVOS;
- demands a compensation that is not commensurate with the fees and commissions normally paid for such services;
- requests that commissions be paid in a different country, to a different party or in cash or untraceable funds or in advance of ARVOS being paid;
- relies heavily on political or government contacts as opposed to knowledgeable staff and the investment of time to promote ARVOS' business;
- refuses or is unable to develop or implement a market strategy and to document efforts undertaken on behalf of ARVOS;
- refuses to accept anti-corruption safeguards in a contract that would set forth business terms;
- refuses to provide documentation of his or her services at least quarterly;
- asks the representation to be kept secret; and/or
- has or had problems in its relationship with other foreign companies.