

Anti-Bribery and Anti-Corruption Policy

1. Purpose

The purpose of this policy is to foster a business culture of integrity and trust while preventing bribery and corruption within MSK Group Corporate. It outlines our commitment to ethical conduct, compliance with anti-corruption laws, and the consequences employees will face if they engage in such activities.

2. Scope

This policy applies to all employees, contractors, suppliers, business partners, joint ventures, and any other entities or individuals directly associated with MSK Group Corporate.

3. Definitions

- **Bribery:** The offering, giving, receiving, or soliciting of anything of value as an inducement or reward for an action that is illegal, unethical, or a breach of trust. For example, Purchasing Manager accepts a bribe from a supplier, and in return, the supplier secures a contract for their products or services.
- **Corruption:** While bribery is a specific act of offering or receiving something of value, the corruption encompasses a broader range of unethical behaviors and abuses of power. So, in brief, by “corruption” we understand any dishonest or unethical behavior that undermines the integrity of our company.

4. Policy Statements

a. Committing to Ethical Business Practices

At MSK Group, we are committed to fairness and ethical business practices. We will not tolerate any form of bribery or corruption, whether direct or indirect.

b. Compliance with Laws

We are committed to complying with all applicable anti-corruption laws and regulations in the countries where we operate. We monitor ongoing compliance efforts actively.

c. Prohibited Activities

Employees must not be the perpetrator or recipient of the following acts:

- **Bribery:** Offering, giving, receiving, or soliciting something of value (such as money, gifts, or favors) to influence a decision or gain an unfair advantage.



- Lobbying: Improperly influencing government officials or legislators to promote specific interests.
- Extortion: Coercing someone into providing money, property, or services through threats or intimidation.
- Cronyism: Favoring friends, family members, or close associates in business.
- Parochialism: Prioritizing local interests over broader concerns.
- Patronage: Appointing individuals to positions based on personal connections rather than merit.
- Graft: Embezzling money or accepting bribes for personal gain.
- Embezzlement: Misappropriating money entrusted to an individual's care.
- Use third parties to implement any of these activities mentioned on our behalf.

d. Allowed Activities

Employees are allowed to accept:

- Small Gifts:
Employees may accept small, nominal, or token gifts that have a value less than 100 €. In any case the key is that these gifts do not compromise the employee's integrity.
- Business Courtesies:
Accepting reasonable business courtesies, such as a meal during a business meeting or attending an industry conference, is generally acceptable.
- Promotional Items or Samples:
Accepting promotional items or product samples related to the business (e.g., a new software demo, a sample product) is generally acceptable.
- Charitable Donations:
Employees may accept invitations to charity events or fundraisers. Supporting a good cause is generally encouraged. However, employees should avoid all situations where the donation is directly linked to a business decision.

e. Reporting

Employees must promptly report any actual or suspected bribery or corruption to their supervisor or to Group CEO directly or via Whistleblow-channels. We encourage reporting of any unethical activities, and we guarantee the confidentiality and protection for whistleblowers without fear of retaliation.



f. Consequences

We emphasize the importance of corrective action for all unacceptable practices, and we address problems identified in a reasonable way. Ultimately, violations of this policy will result in disciplinary action, which may include termination of employment or legal action.

5. Training and Communication

We utilize e-training platform in anti-bribery and anti-corruption training.

Main themes are e.g.:

Understanding Bribery and Corruption, Legal framework, Understanding key terms such as corruption, bribery and kickbacks, Understanding types of corruption such as nepotism and favoritism, Understanding prohibited and allowed acts, Understanding how corruption impacts to e.g. human rights and reputation, Consequences and penalties, Reporting mechanisms, Encouraging critical thinking and decision-making.

Training will be carried out during onboard training and once in every three years to all relevant employees.

This policy will be communicated also to external partners and stakeholders.

6. Monitoring and Review

We review the anti-bribery policy in every two year or immediately, if needed, in the Group Management Team to assess its effectiveness. We ensure that identified deficiencies lead to necessary improvements. We report all findings to the Board of Directors.

We prioritize monitoring of functions and transactions with higher bribery risks such as procurement and international business.

We try to identify areas for improvement and drive continuous enhancement.



7. Roles and Responsibilities

Function	Roles and Responsibilities
Group Management Team (GMT)	Responsible for policy approval.
Chair of the Board	Policy owner with overall responsibility to GMT for corruption issues in the MSK Group.
HR and Communication Director	Responsible for the implementation of the policy in the organization via communication & training.
Managing Directors	Responsible for ensuring that this policy is implemented and adhered to, and that all employees, third parties and business partners are made aware of the policy and its requirements. Responsible for conducting regular risk assessments related to this policy.
Management, employees, and contract workers of all companies in the MSK Group	Responsible for adhering to this policy.

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