

# ANTI-CORRUPTION POLICY TEMPLATE

## 1. General rules

Our company stands against all forms of corruption and does its best to avoid corruption while making business. We are aware of that corruption can be active (e.g. offering a gift) or passive (e.g. accepting an unfair advantage) in nature. An unfair advantage or benefit may include cash, any cash equivalent (e.g. voucher), gift, credit, discount, travel, personal advantage, accommodation or various services. Our company's employees and partners may not offer, provide, request or accept any benefit or advantage intended for bribery or unfair influence over others' decisions.

To decide whether a specific behaviour qualifies as corruption you should consider the following:

- **OBJECTIVE:** What is the objective of the given behaviour? May others have a good reason to assume that this specific behaviour aims to have an unfair influence over others' decisions?
- **CIRCUMSTANCES:** In what environment does the given behaviour take place? (E.g. specifically in or right before a decision-making situation?)
- **CONTENT:** Is the given behaviour common in business? Does not the offered benefit have an excessive value?
- **PERSON INVOLVED:** What is the role of the person affected by the given behaviour (e.g. corporate decision maker, government official, etc.)?
- **TRANSPARENCY:** Are all components of this behaviour transparent or may the parties involved have some hidden intentions? Would they be willing to acknowledge these intentions in public?
- **FREQUENCY:** How frequently does this behaviour occur?
- **TAX:** Is there any taxation issue related to this behaviour?

## 2. Business gifts and courtesies

Offering, providing or receiving any gifts that are of modest value does not qualify as bribery. However, offering, providing or receiving cash, any cash equivalent is forbidden. It is the responsibility of the person offering, providing or accepting the gift to decide whether the gift is appropriate and its value is modest.

## 3. Events and meetings

Invitations to or attending customary and commonly accepted business related gatherings or arrangements with clear business reason such as business lunches and other professional gatherings with modest and reasonable costs do not qualify as bribery. It is not allowed to invite people or accept invitations to expensive or extravagant events. The person sending the invitation/organizing or attending the event should check in advance whether the event or arrangement does not violate any rule. Travel, accommodation and other related expenses must be paid for by the invited party in any case.

Our company takes firm action against those violating the above mentioned rules that may face the most serious consequences for such violations.