

ALTIA ANTI-BRIBERY AND -CORRUPTION POLICY FOR SUPPLIERS AND BUSINESS PARTNERS

(Updated 30 September 2019)

1. Introduction

As part of its anti-bribery and -corruption initiatives, Altia has introduced this Anti-Bribery and -Corruption Policy for Suppliers and Business Partners (hereinafter referred to as "Policy"). This Policy constitutes an integral part of all agreements entered into by Altia with its suppliers and other business partners.

Being compliant with anti-bribery and -corruption rules and principles enables Altia to maintain its good reputation and to contribute to the general well-being in all countries where it is operating. Therefore, all actions of Altia's suppliers, vendors and other business partners ultimately influence Altia's good reputation, either strengthening it or endangering it.

The foundation of this Policy is the principle of zero-tolerance towards bribery and corruption in all of its forms, including facilitation payments. Therefore Altia expects its representatives, consultants, agents, subcontractors, distributors, vendors and other parties (hereinafter jointly referred to as "Suppliers" or individually "Supplier"), when performing services for Altia or on its behalf or engaging in any other business dealing on behalf of or for the benefit of Altia, to unconditionally comply with this Policy, in addition to any applicable local anti-bribery and -corruption laws.

This Policy is based on the Altia Group Anti-Bribery and -Corruption Policy approved by the Board of Directors Altia Plc, the parent company of the Altia Group.

2. Bribery and corruption

2.1 Definitions

Corruptive behavior means in this Policy any kind of dishonest behavior by those in positions of power. Corruption includes e.g. giving or accepting bribes or inappropriate gifts, double dealing, under-the-table transactions, manipulating books, diverting funds, laundering money, nepotism, conflict of interest and defrauding investors.

Bribing is the act of giving money, goods or other forms of reward or benefit to a recipient in exchange for an alteration of his/her decision to the benefit/interest of the giver. Without bribing the recipient would otherwise not alter his/her decision.

Government official means any officer or employee of a government or agency, including local and municipal agencies and bodies, state owned or controlled enterprises, public agencies or international organizations. This means that also e.g. members of political parties or party officials or candidates can be considered government officials, as well as any person acting in an official capacity on behalf of any of the foregoing.

2.2 Principles

Altia maintains an unconditional zero tolerance towards any kind of unjust and unfair influencing in connection with its business operations. Accordingly, this means that a Supplier must not, directly or indirectly, offer or give, or request or accept any kind of advantages to/from its business partners or government officials, which is or could be seen as corruptive behavior.

A Supplier shall e.g. abstain from giving its business partners' decision makers any gifts or benefits for the purpose of influencing their decision-making in the course of a bidding processing or business negotiations.

3. Gifts, Hospitality and Entertainment

3.1 Definitions

Hospitality means the provision or acceptance of meals, refreshments and other such consumables in connection with business dealings.

Gift means any item, service, or a combination thereof, of value that is given for the personal benefit of the receiver at no cost, at a very low cost or at otherwise disproportionate conditions.

Entertainment means access to events or activities or other such treatment offered for the personal benefit of the receiver and hosted by the offeror. As entertainment can be understood hosted theater events, sport events and other events of recreational nature.

3.2 Principles

3.2.1 Hospitality

A Supplier shall always abstain from accepting or offering hospitality if doing so might compromise, or appear to compromise, the Supplier's or the receiver's objective decision making.

Providing or accepting hospitality in the form of meals and beverages is acceptable when such is customary and reasonable, in connection with normal conduct of business, reasonably infrequent, does not influence the Supplier's or the receiver's decision-making, and is in line with this Policy and local business practice in the country in question.

3.2.2 Gifts and entertainment

A Supplier must not accept or give gifts or entertainment if doing so is intended to compromise, might compromise, or appear to compromise, his/her or the receiver's ability to make objective business decisions.

The Supplier shall never accept or request, give or offer:

- monetary gifts, including cash or securities;

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- gifts or entertainment in connection with bidding or procurement processes. Hospitality is however allowed to the extent it cannot compromise, or appear to compromise, the Supplier's or the receiver's ability to make objective business decisions;
- gifts, hospitality or entertainment to government officials, their family members or interested parties thereof.

4. Implementation

Altia reserves the right to monitor and audit its suppliers and third parties in order to ensure compliance with this Policy. Altia will only conduct such audit should it have a genuine reason to suspect that a Supplier is not in compliance with the principles of this Anti-Bribery and -Corruption Policy. Any audit shall be conducted as non-invasively as possible to achieve the objective of the audit.

If this anti-bribery and -corruption policy has been significantly violated, Altia shall have the right to terminate the contract and cooperation with the Supplier, applying if necessary a notice period reasonable under the circumstances to safeguard the Altia's business interests.