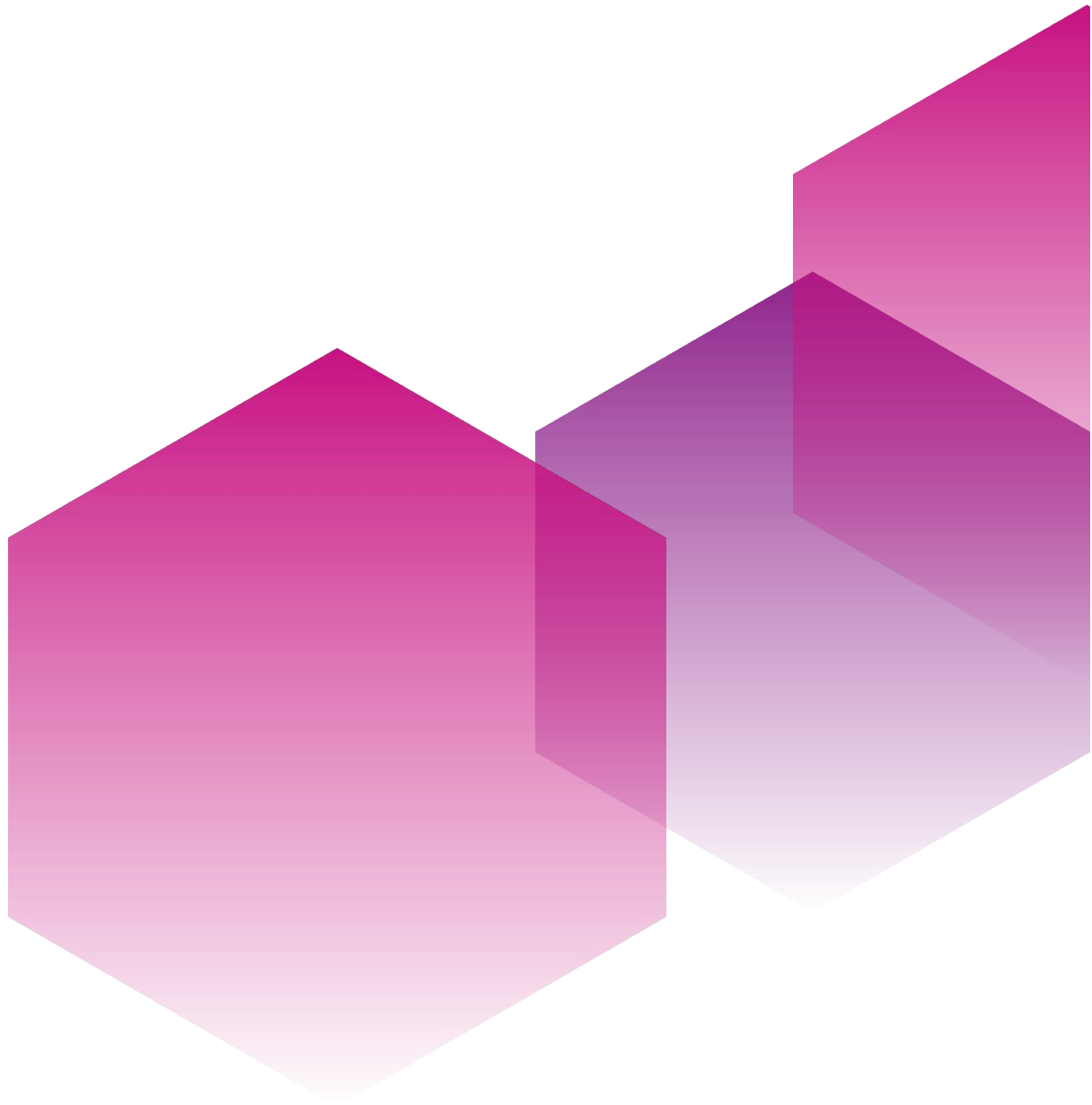


Anti-corruption policy



1. Introduction

Advania Group observes high standards of ethical business conduct throughout all operations. Bribery and other forms of corruption are criminalised offences which can have severe consequences for both business and individuals, such as reputational damage, loss of business, trading prohibition, fines, and imprisonment. This Anti-corruption policy (hereinafter “Policy”) sets out Advania Group’s commitment to always conduct business in line with legislation and ethical business practises. The Policy expands our Group Code of Conduct for Employees and our Group Code of Conduct for Suppliers and is supported by Group Guidelines on Anti-corruption. The Anti-corruption policy in English is the official version. Should there be variations or discrepancies in translations, the English version takes precedence in determining its meaning and application.

2. Scope

This Policy applies to all Advania Group companies and all its employees, management, and board members, including part-time employees, temporary workers, and trainees (jointly “Staff”). Advania Group also expects that Business Partners act in adherence with ethical business practises, as outlined in Advania’s Code of Conduct for Suppliers. This expectation extends to all Business Partners, including agents, consultants, distributors, suppliers, and sub-contractors (jointly “Business Partners”).

The Anti-corruption policy is communicated during the onboarding of Staff and Business Partners and is available to read on www.advania.com, as well as on the local websites and intranets.

3. Policy Statement

Advania Group has zero-tolerance towards all forms of corruption, financial crime, and unethical business practises, including but not limited to bribery, money laundering, fraud, embezzlement, and extortion.

Advania is committed to:

1. Comply with applicable laws and regulations in the markets where Advania Group operates, as well as the principles set out by international initiatives of which Advania Group is a member, such as the UN Global Compact.
2. At no time offer, promise, provide, authorise, request, accept or receive a bribe, either directly or indirectly. A bribe or undue benefit is any benefit that, due to its nature and/or the context in which it is offered or provided, may create a risk of influencing the recipient’s performance of their professional duties. This prohibition includes small payments made to secure or expediate routine government action or services (so called facilitation or grease payments).
3. Under no circumstances offer, promise, provide or authorise any form of benefit to a public official exercising public authority, or to any person involved in public procurement.
4. Never offer, promise, provide or authorise any form of benefit to any other person in the public sector or publicly owned entities, unless explicitly permitted by local guidelines. All such benefits require prior approval from the local compliance officer or legal department (whichever is applicable). If there is any uncertainty, Advania shall abstain from offering such benefits.
5. Assess our Business Partners and manage identified risks related to their business ethics performance.
6. Always act in line with the best interest of Advania Group when making business decisions. Actions constituting favouritism or preferential treatment of friends and family or similar are not accepted. Where there is an actual or perceived conflict of interest, Staff must recuse themselves from handling the matter.
7. Keep transparent books, records and accounts with reasonable detail and accuracy. Annual accounts and reports are subject to statutory audit where applicable.
8. Ensure that payments to our Business Partners are based on objective grounds, are reasonable and correspond to services performed and delivered to Advania Group.
9. Not accept any payments from accounts belonging to any other party than our customers and their affiliate or group companies.
10. Not accept payments in cash, commissions, discounts, or other forms of benefits from Business Partners that may constitute illegal compensation for preferential treatment, also known as a kick-back.



11. Regularly train Staff in Advania's policies to ensure awareness of company values and expectations and enable them to fulfil their work duties in an ethical way, including supplementary training for persons in management positions and high-risk roles (e.g., Staff working with the public sector).
12. Offer safe reporting channels for the reporting of confirmed or perceived violation of Advania Group's policies, and effectively manage confirmed cases or suspected incidents of unethical practises or behaviour.
13. Staff may submit concerns to their manager or report anonymously via the internal whistleblowing channel, available on the local company websites and intranets. Where needed, managers should consult the local compliance team or the Group Compliance Officer for guidance. External stakeholders may submit reports through Advania's external whistleblowing channel available on www.advania.com.
14. Protect whistleblowers from retaliation. Advania's Whistleblower Policy prohibits all retaliation against Staff reporting in good faith.

4. Responsibilities

1. Staff have a duty to read, understand and act in alignment with this Policy, the Group Guidelines on Anti-corruption and any other supporting documents provided by Advania Group, as well as undergo mandatory trainings at the interval set by Advania Group. A Breach of this Policy and/or the Group Guidelines on Anti-corruption may result in disciplinary action, including termination of employment, as well as criminal charges.
2. Managers at all levels are responsible for ensuring that the Staff within their respective business area understands and complies with this Policy. This is a delegated responsibility from the local CEO or CFO (whichever is applicable).
3. Local compliance officers are responsible for the implementation of group policies and procedures in the local company. This is a delegated responsibility from the local CEO or CFO (whichever is applicable).
4. The local CEO or CFO (whichever is applicable) of each Advania Group company is responsible for the local implementation of and compliance with this Policy within each respective company.
5. The Group Compliance Officer is responsible for reviewing this Policy at least annually, adopting necessary updates and ensuring its effective communication and implementation, including by raising relevant issues with the Group CEO.
6. The Group CEO has the overall responsibility for regulatory compliance within the Group and acts as the escalation point for the Group Compliance Officer in case of severe breaches of Group policies.
7. The ultimate responsibility for the review and approval of this Policy lies with the Board of Directors of Ainavda Holding.

