

Anti-corruption and bribery policy

At Roblon, we expect all external relations to maintain a high level of integrity and responsibility, and the Group does not participate in corruption or bribery. The Group does not offer, promise or give any form of bribe for the purpose of exerting undue influence on external relations, public or private. Roblon also does not receive or accept any form of bribe.

Roblon realizes its policy by:

- Elements of Roblon's code of conduct aim to ensure that Roblon does not participate, directly or indirectly, in corruption or bribery. The code of conduct has been communicated to all employees, suppliers, and other business partners, who are all required to endorse it.
- When new customers are set up in our system, any relevant risk factors in the customer relationship are identified.
- Having established and implemented a whistleblowing scheme enabling employees, former employees, customers, suppliers, business partners, shareholders, and other stakeholders to report suspected unlawful or unethical conduct within the Roblon Group, such as suspected financial crime, bribery, corruption, breach of competition law or environmental and climate regulations, discrimination, bullying, threats, or sexism.

Gifts, entertainment, and hospitality

Roblon recognises and accepts that the occasional offer/acceptance of a modest gift, entertainment or hospitality can make a valuable contribution to the development and maintenance of good business relationships.

However, Roblon employees may not request, give, or receive, either directly or indirectly, gift, entertainment, or hospitality in relation to an individual or company with which it does business with if the benefit could unnecessarily influence the judgment of the recipient e.g. by creating a disproportionate obligation to return the favor. Employees need to be careful and assess what is expected in return when a gift, entertainment or hospitality is offered. A gift, entertainment or hospitality that is designed to influence a business decision in Roblon's or a business partner is considered as a bribe.

The following examples are never acceptable:

- Anything illegal.
- Cash or cash equivalents, such as gift vouchers, shares, or other items redeemable for cash, regardless of the amount involved.
- Anything that is extravagant or not proportionate with the occasion.
- Anything that could affect or appear to affect the recipient's business judgment.
- Anything that is counter to the group's principles and ethical business practices (e.g., sexual favors, and events at sexually oriented clubs).
- Anything that would damage Roblon's reputation if publicly reported, either locally or internationally.
- Anything that contravenes the recipient's internal rules and standards, including government officials.
- Any gift or benefit that has to be kept secret from other colleagues, an employee's immediate manager or any other relevant parties.