

Anti-Corruption Policy

1. Introduction

The Company ability to run a successful and growing business worldwide is dependent on a trustworthy corporate reputation in the marketplace as well as in relation to relevant authorities. With Company ISO 27001 certification, the organization ensures compliance with applicable legislation as well as recommended best practices and guidelines. The company's long-standing commitment to doing business with integrity means avoiding corruption in any form, including bribery, and complying with the anti-corruption laws of every country in which Auditdata operates.

This document outlines the Company Anti-corruption Policy, which intends to help the organization's employees, who find themselves having to deal with difficult situations where ethical choices must be made. And, further, to equip the employees with the knowledge to identify actual or potential corrupt practices and provide them with a clear system for reporting these and with support from the management to tackle such situations.

2. Key Definitions

BRIBERY	Giving or receiving something of value to influence a transaction.
ILLEGAL GRATUITY	Giving or receiving something of value after a transaction is completed, in acknowledgment of some influence over the transaction.
EXTORTION	Demanding a sum of money (or goods) with a threat of harm (physical or business) if demands are not met.
CONFLICT OF INTEREST	Where an employee has an economic or personal interest in a transaction.
KICKBACK	A portion of the value of the contract demanded as a bribe by an official for securing the contract.
CORPORATE ESPIONAGE	Theft of trade secrets, theft of intellectual property, or copyright piracy.
COMMISSION/FEE	Used by a company or individual to obtain the services of an agent/agency for assistance in securing a commercial contract.

3. Regulations and Guidelines

The corrupt practices to which the Company Anti-corruption Policy applies, are defined above, but it is not limited to these: Other types of inappropriate business conduct shall also be included in the scope of the policy, should such conducted be detected. The company approach is informed by the concept of proportionate procedures. In this respect Auditdata considers differences in geographical markets / jurisdictions, in which the company operates.

The Company Anti-corruption Policy emphasizes top-level commitment – i.e. the commitment and awareness of the owners, board and management. At the highest level, this shall mean that the board includes reviews and possible improvements and/or changes to the Company anti-corruption policy on the board meeting agendas on a regular basis.

All employees receive information about the Company Anti-corruption policy in line with these regulations and guidelines. The key in-house rules and instructions are the following:

3.1 Security Events

All employees are instructed to immediately report to the management any incidents or any suspected risk of corrupt practices that they experience. Except in cases where secrecy is a primary concern, this shall be done by e-mailing incidents or risk description to securityevent@auditdata.com, and, as necessary, follow up by verbal elaboration to the management. In the former cases only, confidential reporting is accepted, and may or may not be involved in terms of reporting to external authorities (please see below).

Incidents or risks include corrupt practices or suspicion thereof concerning present or potential business partners, 3rd parties (such suppliers), customers, authorities, or other external parties, as well as other employees in the Company organization.

After such reporting, the management is obliged to thoroughly investigate the issues raised and take the appropriate preventive or correcting action.

Should any of the company employees be found and proven to be engaging in any type of corrupt practices, this will result in immediate termination of employment. Should suspicion of such activities be detected, investigation should be undertaken by the management, and action taken in line with the results of this investigation. If an employee is found to be involved in corrupt practices inadvertently, training, together possibly with disciplinary procedures to address negligence or insufficient awareness of the Company policy, must be carried out.

3.2 Exceptions

The Company policy is that accepting/giving minor gifts or accepting/providing invitations to professional or cultural events (as tokens of appreciation or for promotion or relation-

building purposes) or inviting external parties for occasional meals or accepting similar invitations, is considered fully in line with normal business practices.

4. Change Log

Revision	Change Description	Author
01	Initial release	tetnik