

ANTI-CORRUPTION POLICY

PURPOSE

The purpose of this policy is to prevent any form of corruption or bribe in Techstep's business activities and help ensure that business is conducted ethically and in compliance with applicable rules.

SCOPE

This policy applies to all employees and representatives of Techstep ASA. Techstep's executive management team has the responsibility for integrating the principles into day-to-day operations. We also expect our business partners to abide by the same principles in their own operations.

OUR APPROACH

Corruption is illegal, often with far-reaching consequences with penalties such as large fines to imprisonment of involved individuals. It can also severely damage Techstep's reputation. At Techstep, we want to build integrity, trust and respect. We have zero-tolerance for any form of corruption, fraud and bribery.

We consider it corruption if a person promises, offers or gives, or requests, receives or accepts an improper benefit by virtue of his or her position¹. A benefit is considered improper if it can influence, or be perceived to influence, the receiver's ability to make sound and objective business decisions. Improper benefits may include cash, kickbacks, expensive gifts, hospitality/entertainment and travel. Other examples may be more indirect, such as loans with low interest terms, internships or job offers.

Breaches of this policy or violation of applicable laws may result in disciplinary actions, including dismissal and reports to the relevant authorities.

OUR COMMITMENTS

- Comply with applicable laws and regulations
- We act in the best interest of Techstep, and never compromise ethics or integrity when doing business
- We do not offer, give, authorise, pay or accept bribes, kickbacks or facilitation payments to or from anyone
- If corruption is a necessary condition for doing business, we refrain from participating
- All commercial transactions entered into by Techstep must be clearly specified in the group accounts and be compliant with international standards
- Candidates are hired based on their merits, and not to benefit others
- Any sponsorships or donations are made to support a legitimate charitable cause, not as an exchange of favours
- We are transparent, share and discuss dilemmas, and seek guidance when in doubt
- We speak up and report anything that is likely to constitute a breach

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt, the matter should be referred to your manager or to our Head of Compliance. Please also refer to Techstep's Code of Conduct and Whistleblower routines.

¹ the Norwegian Criminal Act Section 387

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1.0	Børge Astrup, CEO	[17.02.2022]	Head of Compliance	New