

Arsandis Anti-Corruption Compliance Policy

Arsandis is committed to conducting business with integrity, transparency, and accountability. This Anti-Corruption Compliance Policy outlines our zero-tolerance approach to bribery and corruption and provides guidelines to ensure compliance with all applicable anti-corruption laws and regulations.

1. Scope

- This policy applies to all employees, officers, directors, agents, consultants, and any other third parties acting on behalf of Arsandis worldwide.

2. Definition of Corruption

- Corruption refers to the abuse of entrusted power for private gain. This includes, but is not limited to, bribery, kickbacks, extortion, fraud, embezzlement, and nepotism.

3. Prohibited Conduct

3.1 Bribery

- Offering, promising, giving, accepting, or soliciting a bribe is strictly prohibited. This includes any form of payment, gift, favor, or advantage intended to influence a decision or gain an improper advantage.

3.2 Facilitation Payments

- Facilitation payments, also known as "grease payments," intended to expedite or secure the performance of a routine governmental action, are prohibited.

3.3 Gifts and Hospitality

- Gifts and hospitality must be appropriate, reasonable, and transparent. Lavish or inappropriate gifts and hospitality that could be perceived as attempts to influence decision-making are prohibited.

4. Due Diligence

4.1 Third Parties

- Conduct thorough due diligence on all third parties, including agents, consultants, and business partners, to ensure they comply with anti-corruption laws and this policy.

4.2 Mergers and Acquisitions

- Conduct appropriate due diligence on potential merger and acquisition targets to identify and mitigate any corruption risks.

5. Record-Keeping

- Maintain accurate and complete records of all transactions, gifts, and hospitality provided or received. All financial records must accurately reflect the nature of the transactions and be maintained in accordance with applicable accounting standards and regulations.

6. Reporting and Whistleblowing

- Employees are encouraged to report any concerns or suspicions of corruption or bribery to their manager, the compliance officer, or through the whistleblowing hotline. Reports will be treated confidentially, and retaliation against whistleblowers is strictly prohibited.

7. Training and Awareness

- All employees will receive regular training on anti-corruption laws and this policy to ensure understanding and compliance. Training will cover the identification of corruption risks, prohibited conduct, and reporting mechanisms.

8. Compliance Monitoring

- Arsandis will conduct regular audits and reviews of business operations and transactions to ensure compliance with this policy. Non-compliance may result in disciplinary action, up to and including termination of employment or contracts.

9. Governance and Accountability

- The company management is responsible for overseeing the implementation and enforcement of this policy. Employees are required to cooperate with any investigations related to potential violations of this policy.

10. Review and Updates

- This policy will be reviewed annually and updated as necessary to reflect changes in laws, regulations, and business practices.

11. Acknowledgement

- All employees, officers, and relevant third parties must acknowledge that they have read, understood, and agree to comply with this policy.