

To whom it may concerning

Anti-Bribery Policy

1 Objective

The objective of this Anti-Bribery Policy is to state the requirements for business practice and personal conduct within Polaris Electronics.

2 The purpose of the Anti-Bribery Policy

Polaris Electronics A/S recognises that corruption and other unethical practices undermine the support and confidence of its business environment (customers, donors, suppliers, agents, consultants and all other business relations), which is key to its business success.

In support of these principles, Polaris Electronics has developed this Anti-Bribery Policy for countering corruption, bribery and other unethical behaviour. Within Polaris Electronics everyone is obliged to comply with both applicable laws and regulations and this Anti-Bribery Policy and all relevant policies and guidelines in the daily work.

If applicable laws and regulations require higher standards than this Anti-Bribery Policy, such standards must be followed.

3 Combating bribery and corruption

Bribery and Corruption undermine legitimate activities, distort competition, ruin reputations and expose Polaris Electronics and individuals to risk.

Polaris Electronics has a zero tolerance policy against bribery and corruption and will exercise all due efforts to secure that bribery does not occur in its business activities.

Bribery is a form of corruption consisting in the offer or the exchange of any improper advantage made to influence someone in the conduct of their duties, e.g. any gift, loan, fee, reward, credit, discount, travel, accommodation or other advantage between anybody working for or on behalf of Polaris Electronics and any person external to Polaris Electronics.

A kickback is a form of bribery between private entities, inter alia, made with the purpose of winning a tender for a contract. In this situation, the person who shall award a contract or an order does not necessarily award it to the best bid or proposal, but rather to the payer of the kickback. A kickback in this situation is illegal even if the company, which pays it, presents the best bid and would have won the contract even without the kickback.

Polaris Electronics will not pay or promise to pay any kickback in exchange for contracts/orders being awarded to a specific supplier. Furthermore, Polaris Electronics will not promise, solicit, give or receive any advantage that can be seen to be in connection with the awarding of a contract, regardless of whether such advantage is exchanged before or after the contract has been awarded.



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Facilitation payments are a form of bribery made with the purpose of expediting or facilitating the performance by a public official of a routine governmental action, and/or expediting or securing the provision of products or services to which Polaris Electronics has a rightful claim. Polaris Electronics is against facilitation payments and will actively oppose them if/when we meet them. The fact that corruption is a common practice in a given country does not make it more legal. In particular, even in cases of smaller illegal payments, reference to local habits and patterns of trade are not a defence acceptable to the given country's or Danish courts.

Political contributions are defined as financial or other kinds of support given to political parties and political campaign efforts, whereas charitable contributions are defined as contributions made to charitable causes or organizations. Polaris Electronics does not support individual political parties or individual politicians. Employees in Polaris Electronics may, however, exercise their private rights to participate in democratic political activities, provided that this is without any reference to or connection with their relationship to Polaris Electronics.

Charitable contributions and community support as well as donations, e.g. knowledge, services exchange, or direct financial contributions are acceptable, provided that such donations are not given with the purpose of obtaining or retaining business or any other undue advantage. Polaris Electronics' employees must ensure, through due diligence and transparency, that charitable contributions and sponsorships are not used as a substitute for, and do not constitute, bribery. Consequently, such donations should only be given to organisations, not individuals.

Gifts and Hospitalitys such as flowers, confectionary, wine, writing pens, tickets to sporting and cultural events provision of meals, receptions, social events, entertainment etc. must always comply with the laws of the country in which they are promised, solicited, given or received. In this respect, Polaris Electronics' employees shall keep in mind that stricter rules normally apply to dealings with the public sector than with the private sector.

Consequently, Polaris Electronics' employees will not offer or accept hospitality or gifts with the purpose of obtaining or retaining business or any other undue advantage or from clients within the public sector. Neither will Polaris Electronics' employees offer or accept gifts or hospitalitys which are unreasonable, excessive or exceeding normal market practice. Gifts in cash form or those equivalents to cash – such as gift certificates – are prohibited for Polaris Electronics' employees to promise, solicit, give or receive. Gifts for or entertainment of parties engaged in tenders or competitive bidding processes are forbidden altogether.

4 Complaints and reporting

If an individual comes across cases of ethical doubts or breaches of Polaris Electronics' Anti-Bribery Policy, these concerns must be reported immediately. Individuals may at their own discretion be reporting either through the regular channels to the Polaris Electronics responsible for the matter in which the issue occurs (provided that the matter partner is neither the person reporting nor the subject of the report), or to the Compliance Officer or Managing Director of Polaris Electronics.

Employees who choose to report (whistleblowers) will not face reprisal.

The person receiving such report shall duly examine and - to the extent relevant - escalate the matter through the regular channels. The Board of Directors of Polaris Electronics shall have the ultimate power and responsibility to handle any matters, which cannot be solved at a lower level.

The storage of information about the whistleblower(s) shall at all times abide by the applicable laws and regulations in force for the protection of personal information, inter alia, rules prescribing the deletion of information which is no longer of interest to the company.

5 Sanctions

No employee of Polaris Electronics will be penalised or be subject to other adverse consequences for refusing to pay bribes, even if doing so may cause Polaris Electronics to lose business or suffer any other negative consequence. Additionally, no employee will be penalised for raising questions about or reporting on unethical behaviour or corruption.

Failure to observe this Anti-Bribery Policy is a cause for disciplinary action, including dismissal or summary dismissal, and may be reported to the relevant authorities.

6 Compliance and monitoring

This policy is adopted by the Board of Directors of Polaris Electronics. The management of Polaris Electronics will recurrently review and update this policy and monitor its observance by all managers, employees and third parties' business partners acting on our behalf.

It is the responsibility of the management of Polaris Electronics to communicate this policy and ensure that all employees and external parties working on behalf of Polaris Electronics, within their area of responsibility, understand and comply with the aims and procedures of this policy.

7 Communication and Training

All relevant employees will receive relevant training concerning compliance with anti-corruption laws, regulations, or standard conducts relevant for Polaris Electronics' field of business.

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Signed: KT


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