

Anti-corruption and Anti-bribery Policy

The purpose of this policy is to ensure compliance by Ensto and its subsidiaries worldwide with the anti-corruption and anti-bribery laws of all the countries in which Ensto does or intends to do business.

Policy statement

At Ensto Oy and its subsidiaries, i.e. at Ensto Group (jointly "Ensto"), we follow our Code of Conduct in everything we do. Our Code of Conduct sets forth general guidelines for us all. This also applies to the prevention of bribery and corruption.

We have zero tolerance towards bribery and corruption. We do not offer, give, demand, or accept a bribe or other unlawful or improper benefit in any situation.

At Ensto, we do not do business with agents, representatives, service providers, or other third parties who do not adhere to and support our Code of Conduct and Anti-corruption and Anti-bribery Policies.

Scope of application

This policy applies to all persons working for Ensto or on Ensto's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business

partners, sponsors, or any other person associated with us, wherever located.

Definitions

The following definitions shall be interpreted in the ordinary sense of the words. However, if local deviations occur, they will always supersede definitions herein.

Bribery is offering, promising, giving or accepting any financial or other advantage or unlawful or improper benefit, to induce the recipient or any other person to act unlawfully or improperly in the performance of their functions either in public service or private business, or to reward them for acting unlawfully or improperly, or where the recipient would act unlawfully or improperly by accepting the advantage.

A **bribe** is any money, goods, right in action, thing in value, or any advantage, privilege or emolument, or any promise or undertaking to give any, asked, given, or accepted, with the bribery intent, to induce or influence in action, vote or opinion of person in any public or official capacity or other third party.

Corruption is a multifaceted problem categorized by the abuse of entrusted power or position for private gain.

Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example, by a government official).

Kickbacks are typically payments made in return for a business favor or advantage.

Third party means any individual or organization you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Bribes and corruption

At Ensto, bribes and corruption, in any form, are forbidden anywhere in the world regardless of local custom. Bribes are forbidden whether it is paid or received or arranged otherwise directly or indirectly and whether received from or paid to a person holding public office or a representative of private business. There is no need for the bribe to be successful to be viewed as corrupt; the offering is enough to amount to a breach of this policy and possibly amount to even a criminal offence.

Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind.

Gifts, hospitality and expenses

We don't accept or give gifts or provide entertainment as rewards, inducement, or encouragement for preferential treatment.

Gifts or dedicated gift cards of low monetary value can be given or accepted subject to careful consideration, provided that the acceptance or giving of such gifts would from an objective outside perspective seem appropriate. Cash gifts can never be accepted or given.

The giving of gifts or provision of entertainment is subject to the

evaluation by the following One-Over-One signature principle by two persons = the applicant plus the leader.

Process follow up and control is done by Chief Financial Officer.

The giving or acceptance of gifts during any contractual negotiations or tender processes is prohibited.

The giving or acceptance of gifts to or from any state, governmental or other similar official representatives is prohibited.

We speak up

Regarding our Code of Conduct, we speak up. We are all obligated to raise concerns about any issue or suspicion of bribery, bribe, or corruption at the earliest possible stage.

Detection of any violations of this Policy, should be reported without any delay to the superior, HR Department or via Ensto's SpeakUp channel. The message can be sent via phone or [via web](#). All suspected violations will be investigated in confidence. All violations will be reported to the Board of Directors of Ensto Oy.

Protection

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

Training and communication

Training on this policy forms part of the induction process for all individuals who work for Ensto, and regular training will be provided as necessary.

Our zero-tolerance approach to bribery, bribes and corruption must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

Breaches of this policy

Anyone who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Depending on the jurisdiction where the breaches take place, they might also lead to a criminal investigation and prosecution.

We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.