

ANTI-CORRUPTION POLICY

Introduction and purpose

Corruption is a threat to fair competition, rule of law and sustainable development. The Nordic Unmanned Group opposes corruption in all forms, and we are committed to conducting business with the highest ethical standards and do not have any tolerance of corruption, bribery or any similar behaviour. Anti-bribery and anti-corruption are a vital issue for our company's risk management and compliance efforts, both internally and in our business relationships.

The anti-corruption policy is implemented to prevent bribery and corruption across Nordic Unmanned Group activities. Its purpose is to ensure that all our business activities are in compliance with legal requirements and applicable rules. It complements our code of ethical conduct for employees as well as our code of conduct for suppliers. It is embedded in our quality management and risk management system.

Scope

The anti-corruption policy applies to all who are acting on behalf of Nordic Unmanned (Nordic Unmanned representatives), including employees, directors, hired-in personnel, consultants, agents, and other intermediaries.

The principles set forth in this policy apply in Nordic Unmanned's interaction with other stakeholders, including business partners and suppliers. We expect all business partners to adhere to anti-corruption rules or policies and applicable legal requirements.

Applicable laws and rules

As a Norwegian-based company, Nordic Unmanned is subject to the corruption provisions in the Norwegian penal code ("straffeloven"), which prohibits all forms of corruption, including bribery, facilitation payments and trading in influence. The penal code also prohibits corruption performed indirectly through agents, consultants, or other intermediaries. The corruption provisions in the penal code apply to all Norwegian citizens and companies, as well as foreign companies and individuals residing in Norway, for corruption committed in Norway and abroad, regardless of whether the action is a criminal offence in the other country or not. It provides for both personal liability and company liability.

Nordic Unmanned is also subject to the legislation in other countries where we do business, which may include the UK Bribery Act and the US Foreign Corrupt Practices Act. It is the responsibility of all Nordic Unmanned representatives to be sufficiently acquainted with applicable laws and rules.

Key principles

Nordic Unmanned complies with all laws against bribery and corruption that applies to the group in the business activities it conducts. We expect that our employees and other representatives, our partners and those with whom we do business will act fairly, honestly and with integrity, always in compliance with the laws against bribery and corruption that apply to them.

We do not have any tolerance for corruption, bribery or any similar behaviour, and our employees must never ask for, accept, receive, offer or give a bribe, facilitation payment or any pecuniary benefit that could be qualified as bribery or corruption.

Any corruption activity, in any form, either in public or private sector, is prohibited.

Our employees must exercise due care not to cross the line between legitimate gifts and business courtesies and bribery, facilitation payments or any pecuniary benefit that could be qualified as bribery or corruption.

Nordic Unmanned will not authorize or tolerate any business practice that does not comply with this policy.

Gifts and hospitalities

Receiving gifts or similar benefits from business partners or other parties with whom Nordic Unmanned representatives engage in the context of professional activities is prohibited unless approved by the Chief Legal Officer.

Offering gifts or similar benefits to business partners or other parties with whom Nordic Unmanned representatives engage in the context of professional activities is prohibited unless approved by the Chief Legal Officer.

Facilitation payments

Nordic Unmanned prohibits facilitation payments. Third-party intermediaries are prohibited to make facilitating payments on behalf of Nordic Unmanned.

Accurate books and records

All Nordic Unmanned books and records must be accurate and reflect each transaction involving any company of the group and/or such company's assets to prevent the possibility of bribes, or other similar illegal behaviours.

It is prohibited to hold transactions secret, unreported or unrecorded.

Expenses must be accurate and appropriate documentation needs to be entered into the company's records before reimbursements can be done/conducted.

All employees are expected to keep accurate books and records.

Follow-up and consequences

Any employee breaching or violating this policy will be subject to the disciplinary procedures, in accordance with the applicable group policies and applicable national regulations.

Third parties working with Nordic Unmanned who are found to violate this policy will be subject to termination of business relationship.

Reporting concerns or breaches of this policy

All employees have a responsibility to comply and ensure compliance with this policy.

Any employee who witnesses a breach of this policy has the responsibility to (promptly) contact the Chief Legal Officer.

Any employee who is unsure, suspects or is concerned that a breach of this policy may have happened either in the past or present by anyone at Nordic Unmanned or anyone being in a business relationship with Nordic Unmanned, is encouraged to address this to the Chief Legal Officer.

Nordic Unmanned will not sanction any person who, in good faith and in a responsible manner, raises any concern about potential breaches of this policy or applicable laws. We will not tolerate any form of retaliation against anyone who has raised an ethical or legal concern in good faith. All reports of suspected violations are taken seriously and will be followed up, as appropriate. Reports may be made anonymously through the company’s whistleblowing mechanism.

Roles and responsibilities

Function/individual	Roles and responsibilities
Board	Responsible for the approval of the policy. The board of directors of the company (the “board”) has the overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework prohibiting corruption and bribery in each of its areas of operation. The board is responsible for periodically assessing the effectiveness of this policy.
Chief Legal Officer	Policy owner with overall responsibility. Responsible for day-to-day implementation and for ensuring its compliance and review.
Leaders, managers and supervisors	Responsible for setting appropriate standards of behaviour, implementing a culture of ethical conduct and integrity, and carrying out training to ensure compliance with this policy.
Management, employees and contract workers of all entities in Nordic Unmanned	All Nordic Unmanned employees are responsible for adhering to the policy.

Deviation

No exemption from this policy may be granted unless in the case of exceptional circumstances. Any such request must be made in writing and addressed to the owner of the policy. The policy owner should assess and decide on each request individually. In the case of exemption this should be clearly documented and logged.

Policy revision

This policy must be reviewed and approved regularly, at least every two years by the board.

Contact

Please do not hesitate to contact the Chief Legal Officer or send an email to post@nordicunmanned.com for further information.