



ANTI-BRIBERY & CORRUPTION POLICY

Anti-Bribery & Corruption Policy

1. Purpose

This policy sets out ConnectMyApps' commitment to preventing bribery and corruption in all its forms. It applies to all employees, contractors, consultants, and anyone acting on behalf of the company, regardless of location or seniority.

2. Scope

This policy applies to:

- All permanent and temporary employees
- Directors and officers
- Contractors, consultants, and agency workers
- Any third party acting as an agent or representative of ConnectMyApps

It applies to all business activities, in all jurisdictions, including those where bribery may be more commonplace. A higher-risk environment does not lower our standards.

3. Legal Framework

ConnectMyApps operates in accordance with Norwegian law on anti-bribery and corruption, including all applicable legislation prohibiting bribery of public officials and in the private sector. This policy also reflects our commitment to compliance in any other jurisdictions where we operate.

ConnectMyApps may be held liable if a person associated with the company engages in bribery to obtain or retain business. This policy forms part of our procedures to prevent that from occurring.

4. What is Bribery & Corruption?

Bribery

Bribery is offering, promising, giving, requesting, or accepting a financial or other advantage to influence the actions of another person, or to reward them for acting improperly. This applies to both public officials and individuals in the private sector.

Corruption

Corruption is the abuse of a position of trust for personal gain. This includes actions that may not involve direct payment but which involve misuse of power, position, or information.

Facilitation Payments

Facilitation payments are small unofficial payments made to secure or speed up routine government actions (sometimes called "grease payments"). These are prohibited under this policy, regardless of whether they are common practice in a particular country or context.

5. Prohibited Conduct

The following are strictly prohibited:

- Offering, promising, or giving a bribe to any person — whether a public official or a private individual
- Requesting, agreeing to receive, or accepting a bribe
- Making or accepting facilitation payments
- Using a third party to do anything that would breach this policy if done directly
- Authorizing or knowingly permitting any of the above
- Failing to report a known or suspected breach of this policy

6. Gifts & Hospitality

Gifts and hospitality are a normal part of business relationships, but they can create conflicts of interest or the appearance of improper influence. ConnectMyApps employees must apply common sense and good judgment.

Acceptable

- Gifts of modest value (under 500 NOK equivalent) that are infrequent and transparent
- Reasonable hospitality (meals, events) that are proportionate and in the normal course of business
- Gifts and hospitality that you would be comfortable disclosing to your manager

Not Acceptable

- Cash or cash-equivalent gifts (vouchers, gift cards) of any amount
- Gifts or hospitality offered at a time when a business decision or tender is pending
- Anything given in expectation of a favour or decision in return
- Hospitality that is lavish, excessive, or difficult to justify

All gifts or hospitality received above 500 NOK in value should be recorded with your manager. When in doubt, decline and disclose.

7. Dealing with Public Officials

Interactions with public officials (government employees, politicians, regulators, or state-owned enterprise employees) carry heightened risk and require extra care. Employees must:

- Never offer anything of value to a public official to influence a decision or obtain an advantage
- Avoid even the appearance of attempting to improperly influence a public official
- Seek guidance from the policy owner before offering any hospitality to a public official
- Be aware that "public official" is broadly defined and can include employees of state-owned or state-controlled entities

8. Third Parties & Due Diligence

ConnectMyApps can be held liable for bribery committed by third parties acting on its behalf. Before engaging agents, intermediaries, consultants, or other third parties in higher-risk situations, employees should consider whether:

- The third party has a good reputation and there are no red flags
- The fees and terms are reasonable and proportionate
- The third party is aware of and willing to comply with our anti-bribery expectations

Any concerns about a third party's conduct should be raised with the policy owner before proceeding.

9. Political Contributions & Charitable Donations

ConnectMyApps does not make political contributions on behalf of the company. Charitable donations may be made where they are legitimate, transparent, and properly approved. Donations must never be used as a cover for bribery.

10. Reporting Concerns

All employees have a responsibility to report known or suspected bribery or corruption. Reports can be made to:

info@connectmyapps.com

Reports will be handled confidentially and investigated promptly. ConnectMyApps will not tolerate any retaliation against an employee who raises a concern in good faith, even if the concern turns out to be unfounded.

11. Consequences of Non-Compliance

Breaches of this policy are treated as serious misconduct and may result in:

- Disciplinary action, up to and including dismissal
- Termination of a contractor or third-party relationship
- Civil or criminal liability for the individual and potentially for ConnectMyApps

We are committed to applying this policy consistently and fairly at all levels of the organization.

12. Training & Awareness

ConnectMyApps will ensure that employees who are exposed to bribery risk receive appropriate training on this policy and their obligations under it. All employees are expected to familiarize themselves with this policy and to ask questions if anything is unclear.

13. Review & Updates

This policy will be reviewed annually, or sooner if there is a material change in the law or in our business activities. The policy owner is responsible for maintaining and communicating updates.