

## Business Ethics and Anti-Corruption Policy

**Viohalco as a holding company, requires its subsidiaries, hereinafter “Viohalco companies”, to incorporate into policies the following Business Ethics and Anti-Corruption policy:**

Viohalco companies are committed to conducting their business with honesty, fairness, and integrity and in compliance with all relevant laws. Viohalco companies ensure transparency in all interactions and acknowledge that they have a moral and legal obligation to act responsibly in all jurisdictions. Viohalco companies’ sustainable business growth and success shall rest on the excellence of their products and services. Viohalco companies cannot tolerate illegal or unethical business activity or unfair competition practices. Their performance and competitiveness are strengthened solely through lawful conduct.

Viohalco companies encourage all their related parties to have the required understanding and consciousness, and to co-operate in any actions that help fight corruption.

### **Anti-corruption and anti-bribery**

Viohalco companies are fully opposed to all kinds of bribery and corruption. In compliance with the anti-corruption and anti-bribery relevant laws as well as internal guidelines, Viohalco companies do not tolerate any form of bribery among employees, public officials, business partners or any business practice that could create the impression of inappropriate influence. Viohalco companies are determined to maintain a culture of honesty and opposition to fraud and corruption. Accepting bribes or bribing can never be accepted for any purpose.

Financial or other contributions to political parties, officials thereof or candidates for public office shall never be made on behalf of Viohalco companies.

### **Gifts, invitations, and other gratuities**

When it comes to gratuities in the form of gifts or invitations, Viohalco companies strictly ensure that no appearance of dishonesty or improper behaviour can arise. Viohalco companies do not allow for gratuities that can raise doubt about their intention or seem to influence business decisions.

Gifts or entertainment of any value to and from any prospective or existing customer or Business Partner (suppliers, contractors, consultants and business associates) should not be offered or accepted for the purpose of gaining a business advantage.

### **Sponsorships and donations**

Along with the values of responsibility, Viohalco companies make sponsorships and donations, being fully transparent and compliant with local laws, ethics, and practices in order to promote education, culture, social or humanitarian causes, sports and environment-friendly behaviour.

### **Money laundering**

Viohalco companies do not participate in any form of money laundering or illicit finance and comply with all relevant laws and regulations in any jurisdiction where the companies conduct business. They undertake the international battle against money laundering and adopt pertinent measures to comply with the relevant provisions.

### **Conflicts of interest**

Employees, management and members of the Board of Directors of Viohalco companies conduct their private and other external activities and financial interests in a manner that does not conflict or appear to conflict with the interests of Viohalco companies.

### **Fair competition**

Viohalco companies conduct their business in free, fair and open competition. Viohalco companies' policy is to compete vigorously and fairly, but always in full compliance with applicable laws and business ethics. Viohalco companies must comply with all applicable antitrust and competition laws and are committed to dealing with competitors with honesty, fairness, and integrity. Competitive advantages are gained through the product offering based on innovation, R&D and engineering and not through unethical or illegal business practices. Viohalco companies do not enter into anti-competitive agreements with competitors, including price-fixing, market allocation or segmentation. Viohalco companies do not exchange commercially sensitive information with competitors.

### **Accounting, books, and records**

Viohalco companies will maintain a system of internal accounting controls and keep its books and records, in reasonable detail that accurately and fairly reflect transactions and dispositions of assets. Viohalco companies provide a transparent, truthful, relevant, comprehensive, and timely disclosure of their affairs.

### **Personal data**

Viohalco companies are committed to the proper and proportionate processing of personal data, strictly for the purposes known to the respective individuals, may the latter be staff, representatives of suppliers, customers or any other parties. Processing is performed in accordance with EU and local legislation, internal guidelines and the tenets of transparency and adhering to the individuals' rights. Personal data is only shared if mandated so by law or with third parties when essential in providing the required services and products while ensuring that these third parties will also comply to relevant legislation and guidelines.

Viohalco companies commit to ensure that personal data is processed lawfully, fairly and in a transparent manner, collected for specified, explicit and legitimate purposes, are adequate, relevant and limited to what is necessary and kept for no longer than is necessary for its intended purposes.

### **Confidential Information**

Viohalco companies protect confidential information, covering all information of a commercially sensitive nature that is not normally known to people outside the respective company. This may include technical information about products or processes, lists of customers, purchase prices and other contractual terms, cost, pricing, marketing or service strategies, Company strategy information, internal Company research material, market insight and any other confidential information obtained by while conducting business on behalf of a Viohalco company.

### **Applicability**

This Policy applies to all employees, officers, directors, and legal entities of Viohalco. When conducting business on behalf of the Company, third parties are required to observe the same level of integrity, ethical conduct, and compliance with the law as Company employees and management. In jurisdictions where local laws or regulations set stricter rules than those set out in this Policy, the stricter rules must always prevail.

### **Governance and accountability**

Responsibility for the implementation of this Policy lies with the most senior executive responsible for each company.

### **Compliance**

All Viohalco companies shall comply with the provisions of the business ethics and anti-corruption policy as well as national laws and regulations. Should there be differences between the content of this policy and the national laws or other applicable standards, the more rigorous requirements shall apply.