



CBK Policy for Anti-Corruption Compliance



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1. Purpose

CBK, and its affiliated entities, are dedicated to upholding anti-corruption legal obligations in all operational contexts. These obligations encompass, among others, the Norwegian Criminal Code, the United Kingdom Bribery Act, the United States Foreign Corrupt Practices Act, and local laws. This Policy is rooted in our Code of Conduct and constitutes an integral component of CBK's governing documents. It outlines core principles and directives that reflect and enforce CBK's unwavering commitment to combat corruption. In cases of conflict between legal requirements, or legal provisions and this Policy, the stricter approach will prevail.

2. Responsibilities

All permanent and temporary CBK employees, members of CBK's Board of Directors, as well as contracted personnel and authorized representatives acting on our behalf, regardless of location, must adhere to this Policy. Non-compliance may lead to severe consequences, including potential dismissal or termination.

CBK's management is accountable for effectively implementing this Policy across each subsidiary through a robust compliance program. This program includes an annual evaluation of corruption risks associated with our business and operations, coupled with the establishment of robust controls to mitigate these risks.

This Policy and its requirements are subject to annual review and a part of the ISO-revisions.

3. Core Principles and Directives

3.1 Zero Tolerance Towards Corruption

CBK is steadfast in conducting business transparently and openly, irrespective of location. We unequivocally reject all forms of corruption, and actively strive to prevent corruption within our business activities. All personnel are strictly prohibited from planning, engaging in, or facilitating corrupt activities, whether in the public or private sector. This prohibition extends to acts of corruption executed by third parties on CBK's behalf.

In accordance with Norwegian and EU law, corruption transpires when an individual, either for personal gain or on behalf of others, offers, solicits, receives, or accepts an improper advantage in connection with a position, office, or assignment. An improper advantage may include any form of value, be it financial or otherwise. The requirement for the improper advantage to directly influence a decision or inaction is unnecessary. Corruption can manifest in various forms, including bribes, kickbacks, facilitation payments, and influence peddling. Bribing occurs when an individual attempts to influence others in fulfilling their duties by offering an undue advantage. Influence peddling occurs when an improper advantage is provided to influence the performance of a third party's responsibilities.



Facilitation payments refer to payments made to expedite or secure the provision of products or services to which one is entitled. Such payments often involve public entities or officials. As a rule, CBK prohibits the use of facilitation payments, even in cases where local laws permit them. However, under very limited circumstances where an individual's life, liberty, safety, or health is at imminent risk, facilitation payments may be permitted. Facilitation payments made under such circumstances must be promptly reported to Local and Group management and accurately recorded in relevant accounting systems transparently.

3.2 Gifts, Hospitality, and Entertainment

Cash gifts or equivalents, such as gift vouchers, credit or debit cards, or loans, are strictly prohibited. Any gift, hospitality, or entertainment that could be perceived as an attempt to improperly influence the recipient is prohibited. Offering or accepting gifts during specific periods, such as contract negotiations, competitive bidding, or tender processes, is also forbidden.

Additionally, CBK employees must not directly or indirectly accept gifts, except for promotional items of minimal value that typically bear a company logo. Other gifts may be accepted only if refusal would cause offense; in such cases, the gift must be immediately surrendered to CBK and considered company property. Modest and non-extravagant gifts may be offered or provided to third parties on an infrequent basis. This also applies to scenarios such as sales competitions. Offering gifts or prizes of significant value to individual employees or teams is prohibited.

This implies that gifts or prizes from vendors to individuals at CBK are not allowed. CBK rewards employees for their contributions based on our strategic priorities, and vendors should not influence this focus with gifts and prizes.

Product samples, gifts, and prizes are the property of CBK and must remain within CBK's possession.

It should also be noted that local tax regulations often impose limitations on the nature and extent of gifts given by employers to their employees.

Hospitality and entertainment, such as social gatherings or meals, are permissible for CBK employees when a valid business rationale exists, costs are reasonable and within limits, and immediate superiors are informed. When unsure, consulting with management or the Quality Manager is advised.

Attendance of events by CBK personnel, such as external training, seminars, or conferences, is allowed if there is a legitimate business reason, with associated costs borne by CBK. However, CBK will not cover expenses like travel, accommodations, or related costs for third parties unless exceptional circumstances are approved by the CEO.



3.3 Additional Mandates for Interactions with Government Entities and Public Officials

All CBK personnel must exercise heightened caution when interacting with government authorities, public officials, and politically exposed individuals. This category includes not only politicians and public sector employees but also individuals with the potential to influence decisions within the public sector or government-owned enterprises.

Gifts, hospitality, and entertainment extended to public officials or politically exposed individuals must obtain advance approval from the CEO. Likewise, any expenses covered by CBK on behalf of such individuals must also be subject to prior CEO approval. All approvals should be documented in writing.

3.4 Third-Party Due Diligence and Risk Management

CBK's third parties include customers, suppliers, agents, brokers, lobbyists, intermediaries, consultants, recipients of sponsorships or donations, joint venture partners, and potential merger.

Adopted by CBK August 2020