

ANTI-CORRUPTION POLICY

PANKAS GROUP



ACP EN V. 1.01

Anti-Corruption Policy

Pankas Group is committed to conducting business with integrity, transparency, and in compliance with all applicable anti-corruption laws and international standards. Corruption distorts markets, undermines trust, and damages our reputation. This Anti-Corruption Policy outlines our commitments to prevent bribery and corruption in all our operations and business relationships.

Pankas Group supports and adheres to internationally recognized principles for ethical business conduct, including the OECD Guidelines for Multinational Enterprises and the UN Convention against Corruption. These frameworks form the foundation of this Anti-Corruption Policy and reflect our dedication to transparency, fairness, and legal compliance in all areas of our operations and throughout our value chain. For more information, please visit [Unglobalcompact.org](https://unglobalcompact.org) and [OECD.org](https://oecd.org).

We expect all individuals and entities acting on behalf of Pankas Group to act lawfully and always uphold the highest ethical standards.

Scope and application of the policy

This policy applies to all employees of Pankas Group and its subsidiaries and applies to all business activities and interactions, including but not limited to:

- Engagement with public and private sector representatives
- Procurement and tendering processes
- Contract negotiations and execution
- Gifts, hospitality, and sponsorships

Policy commitments

The Pankas Group maintains a strict zero-tolerance approach to all forms of corruption and unethical behavior. We are committed to complying with all applicable anti-corruption laws. Local practices that conflict with these laws are not tolerated.

Prohibition of Bribery and Corruption (Improper payments)

Bribery in any form is strictly prohibited. No one acting on behalf of Pankas Group may offer, promise, give, request, or accept a bribe or improper advantage. This includes facilitation payments, unless there is a risk to personal safety and with the approval of senior management.

Gifts and Hospitality

Gifts or hospitality must never influence, or appear to influence, business decisions. They must be modest, reasonable, and approved according to internal guidelines (see appendix).

Conflict of Interest

All employees must avoid situations where personal interests' conflict with company interests. Any actual or potential conflicts must be disclosed to a manager.

Public procurement and tenders (Fair competition)

We uphold principles of fair competition and transparency in all procurement and bidding processes. Collusion, bid-rigging or any unfair practices are strictly prohibited.

Anti-Money Laundering

Pankas Group does not tolerate money laundering. We comply with all applicable laws and expect employees and partners to report any suspicious financial activity.

Roles and responsibilities

Employees

All employees must comply with this policy and report any suspected breaches through the whistleblower system or to their manager.

Managers and Key Personnel

Managing Directors, Finance and Sales Officers are required to complete anti-corruption training upon employment and every two years thereafter. Managers are responsible for fostering a culture of integrity and ensuring compliance.

Due diligence and financial controls

Due Diligence

Before engaging with business partners, Pankas Group conducts risk-based due diligence to assess integrity and compliance with anti-corruption standards.

Financial Control

We have implemented robust financial control mechanisms, including segregation of duties, multi-level approval processes, reconciliation procedures, and monitoring of high-risk payments. These controls are subject to internal audits and reviews to ensure ongoing compliance.

Reporting and monitoring

Employees, suppliers, and other stakeholders can report concerns via the secure whistleblower channel at www.pankas.com. Reports made in good faith will be treated confidentially, and retaliation is strictly prohibited. All reports will be investigated thoroughly and appropriately.

Training and awareness

All key personnel will receive anti-corruption training during onboarding and every two years. Additional training will be provided on an ongoing basis where needed.

Disciplinary action

Violations of this policy may result in disciplinary measures, including dismissal and legal action.

Review and updates

This policy will be reviewed annually and updated as necessary to reflect changes in law or business operations. All updates will be communicated to relevant stakeholders.

Contact information

We understand that some situations may be difficult to interpret in light of this policy's commitments. If you are unsure or you have any questions, we encourage you to reach out to your immediate manager, your Managing Director or Group ESG Manager for support and clarification.

Appendix – guideline on gifts and hospitality

Purpose

This guideline sets out the principles for accepting and offering gifts, entertainment, and hospitality to ensure ethical business practices and avoid conflicts of interest.

General principle

We must never offer or accept gifts, hospitality, or other benefits that could influence, or appear to influence, business decisions or compromise our integrity.

Acceptable gifts and hospitality

Gifts and hospitality may only be accepted or offered if they meet all of the following criteria:

- Modest in value (e.g., promotional items, seasonal gifts of symbolic nature)
- Infrequent and not part of a pattern or ongoing relationship
- Transparent and openly declared
- In line with local customs and company policies
- Not cash or cash equivalents (e.g., gift cards)

Examples of acceptable situations:

- A coffee or meal during a business meeting
- A small promotional gift (e.g., branded pen or calendar)
- Tickets to an event when attended together for business networking

Prohibited gifts and hospitality

You must never accept or offer:

- Cash or equivalent (e.g., gift cards, vouchers)
- Expensive or lavish gifts (e.g., electronics, jewelry)
- Gifts or hospitality during contract negotiations or tenders
- Personal benefits for family or friends
- Anything given in exchange for a favour or business advantage

Reporting and approval

If you are offered or plan to offer a gift or hospitality that may be outside the limits of this guideline:

- **Seek approval** from your manager, Managing Director or Group ESG Manager

Responsibility

All employees are responsible for acting with integrity. If in doubt, the safest choice is to **politely decline or consult your manager**.