

# Anti-Corruption Policy

House of Control AS



## Background and purpose

In the Council of Europe's criminal law convention, it is stated:

*"Corruption threatens the rule of law, democracy and human rights, undermines good governance (...) and social justice, distorts competition, hinders economic development and poses a danger to the stability of democratic institutions and society's moral foundations."*

For a company, involvement in corruption can mean financial loss, loss of reputation and criminal prosecution.

The purpose of this policy is to make our employees aware of the company's attitude and strategy regarding corruption and bribery.

The policy also applies to the company's contracted consultants.

## Definition of corruption and bribery

Corruption is demanding, offering, giving or being given an undue advantage as an employee of the House of Control Group. By improper is meant a good of a nature and size that is contrary to what is right and reasonable.

Corruption can occur in connection with ordinary transactions with customers and suppliers, with employees or other business partners. The undue advantage is corruption when it is a prerequisite for achieving something else. This condition may be that a contract is entered into, that a contract is not cancelled, that matters are not treated as they should be, or the like.

Corruption occurs in the form of bribes. The bribe can be money, assignment of assignments, favouring family, friends and others. The bribe can also be in the form of services, gifts, restaurant visits, travel, tickets to events, or the like.

The answers to the following questions will be indicative of whether an advantage is defined as inappropriate:  
Is the employer informed?

- Are internal guidelines being broken?
- What is the position of the donor?
- What position does the recipient have?
- What is the purpose of the performance/benefit?

## Guidelines for anti-corruption in the House of Control

House of Control has zero tolerance for all forms of corruption and bribery

The company's employees must not, under any circumstances, accept bribes from suppliers, customers or other actors they deal with.

Participation in events where employees represent the House of Control must be justified in terms of business.

The company must contribute to countering corruption among its suppliers and business partners by making demands on suppliers regarding their ethics and social responsibility.

When entering into agreements, it must be ensured that the company's requirements for ethics and human rights are taken care of.

## Business benefits

House of Control prohibits its employees from accepting offers in the form of monetary gifts, gift cards, or other benefits that may constitute an undue influence and all employees are expected to make a thorough assessment of offers in the form of the above benefits.

- Employees must not receive gifts of greater value that come with conditions from the donor
- Employees must not receive gifts with promises of further business
- Payment of personal expenses shall not occur

## Sponsorship

Sponsorship is not bribery, but can pose a risk and be linked to corruption in the event of conflicts of interest on the part of the recipient or the payer. Sponsorship in the form of money or equipment that creates an expectation of reciprocity may be considered an undue advantage.

## Business partners and connections

As a measure to counter corruption in connection with entering into a partnership or acquisition, a comprehensive business review of the company in question is carried out (due diligence).

## Liability

In the House of Control, the following roles have separate responsibilities:

The management in House of Control has a special responsibility for complying with the company's policy, and is responsible for showing this in actions with the right attitude and values.

## Information for employees

Management is responsible for training and informing employees about the company's attitude to corruption.

## Notification

A notification procedure has been drawn up when a breach of the company's guidelines is discovered.

The manager is responsible for informing his employees about this routine and the manager is responsible for informing his employees to notify when suspected of circumstances where corruption may or has taken place.

## Deviations and follow-up

If bribery or corruption is suspected, or it is discovered that bribery or corruption is taking place, the company's reporting routine must be used.

## Revision of the policy

The policy must be revised annually and updated if necessary.

The document must be presented to the board for approval and after revision.

Høvik, June 2024