

Stansomatic Anti-Corruption and Bribery Policy

Introduction

At Stansomatic, we believe that corruption and bribery have no place in our business or in society. As part of this commitment, we have established this policy on corruption and bribery issues to outline our expectations and requirements for all employees, contractors, suppliers and other business partners.

This policy applies to all employees, contractors, agents, suppliers and anyone else who is acting on behalf of the company. Any employee or individual who suspects or becomes aware of any violations of this policy shall report such violations to their supervisor or to the whistleblower mechanism that allows for anonymous reporting. The whistleblower portal can be accessed on our website www.stansomatic.com. No employee or individual will suffer retaliation, discrimination or disciplinary action for reports made in good faith or based on a reasonable belief of violation or suspected violation.

The company will take appropriate action against any employee or individual who violates this policy, including disciplinary action up to and including termination of employment or contractual relationship. Stansomatic may also report any instances of corruption to the appropriate authorities, which may result in civil or criminal penalties.

This policy is intended to prevent and detect corruption and bribery in any form. It is the responsibility of every employee and those acting on behalf of the company to comply with this policy and report any suspected or actual violations. We expect all employees, suppliers and business partners to uphold this policy and take responsibility for their actions.

Stansomatic recognizes that corruption can take many forms, including bribery, conflicts of interest, fraud and money laundering. We are committed to preventing and detecting all forms of corruption and to ensuring that our business practices are transparent, accountable and ethical. We will comply with all applicable laws and regulations related to anti-corruption and will strive to exceed the requirements of those laws whenever possible. We will also implement robust internal controls and monitoring procedures to prevent and detect any potential breaches of this policy. We will regularly review and update our policies and procedures to ensure compliance with changing legal and regulatory requirements.

Anti-Corruption Measures

The following Anti-Corruption issues outline our commitment to conducting business with integrity, and to preventing and detecting corruption and bribery in any form. We have a zero tolerance on corruption and all its forms and aim to train 100% of our employees on it by 2030.

- a) **Gifts and Entertainment:** Employees and those acting on behalf of the company shall not give or receive gifts or entertainment that may influence business decisions or that may lead to conflict of interest. All gifts and entertainment received or given must be reasonable and proportionate. Gifts should only be accepted if in line with or if required by social, courtesy or diplomatic usage. Gifts or hospitality must be transparently disclosed and employees may accept gifts with a value lower than €150. Acceptance of gifts or entertainment greater than €150 must be approved by the company's management. If approval is not given, you must return the gift to its sender and refer to this Policy as the reason why you are unable to accept it. For the sake of transparency, the employee should inform the immediate superior that the gift has been offered and either accepted or refused. Gifts of cash or cash equivalents from third parties are never appropriate and may not be offered or accepted. If an employee has any doubts in relation to whether an offer of hospitality or a gift fall outside this policy, they should ask their superior. Regardless of the value of the gift, all employees are expected to make a judgment call to determine if the gift offered, given, accepted or received is legitimate, not lavish or excessive and does not create an obligation on the recipient to give something in return. All approved and denied sensitive transactions shall be appropriately recorded and maintained for record-keeping purposes.
- b) **Facilitation Payments:** Facilitating payments is prohibited by Danish law. Employees, suppliers and business partners and those acting on behalf of the company shall not offer, promise or make facilitation payments to any individual or organization to obtain or retain business.
- c) **Conflicts of Interest:** Employees and those acting on behalf of the company shall avoid any situation that could create, or be perceived to create, a conflict of interest. Employees shall disclose any actual or potential conflicts of interest to their supervisor.
- d) **Bribery:** Employees and those acting on behalf of the company shall not offer, promise, or give any bribe, kickback or any other form of inducement to any individual or organization to obtain or retain business. Likewise, the company shall not accept any bribe, kickback or any other form of inducement from any individual or organization. We commit to maintaining accurate and complete records of all business transactions and interactions and ensure that all records are retained for a minimum of 5 years.

- e) Fraud: Employees, those acting on behalf of the company and the company itself shall not engage in fraud, dishonesty or deceit to secure unfair or unlawful gain. We are committed to preventing and detecting fraud in all forms, including but not limited to financial fraud, embezzlement and misappropriation of assets. We will establish appropriate internal controls and monitoring procedures to prevent and detect any potential fraud and we will investigate all suspected or actual incidents of fraud in a timely and thorough manner.
- f) Money laundering: We shall not engage in money-laundering activities involving customers, partners, suppliers or other organizations and individuals. The company and all employees are committed to preventing money laundering and terrorist financing in all business operations and we will comply with all applicable anti-money laundering and counter-terrorist financing laws and regulations. We commit to monitoring transactions for any suspicious activities and reporting any suspicious transactions to the appropriate authorities.
- g) Training and Awareness: We provide regular training to all employees to ensure that they understand this policy and its implications. We also raise awareness about the dangers of corruption and bribery and encourage all employees to report any suspected or actual instances of corruption or bribery. It is our goal to increase the percentage of employees who complete anti-corruption training each year to 90%.

Risk Assessment and Due Diligence

We conduct at least one risk assessments annually to identify areas of vulnerability and potential exposure to corruption and bribery. These assessments will consider various factors, including the nature and location of our operations, the types of transactions in which we engage and the relationships we have with third parties. Based on these assessments, we will implement appropriate measures to manage and mitigate any identified risks.

We will also conduct due diligence on all high-risk customers, suppliers, contractors, agents and business partners before engaging in business with them and report any red flags to senior management within 30 days. This due diligence program will include assessing their reputation, background checks and screenings by means of sanction lists, assessments on their own ethics and compliance programs, their track record and compliance with anti-corruption and bribery laws and regulations. We will only engage with third parties who share our commitment to ethical business practices and who have demonstrated their compliance with applicable laws and regulations. Stansomatic shall also include anti-bribery and corruption

clauses in all contracts with third parties. In addition, we will require all third parties to sign this policy or other agreements related to anti-corruption and bribery. These will require third parties to comply with all applicable laws and regulations and adhere to our company's policies and procedures related to anti-corruption and bribery. We will also monitor the activities of third parties with whom we engage to ensure ongoing compliance with these requirements.

Review Process

This policy will be reviewed and updated to ensure ongoing compliance with applicable laws and regulations and implement any necessary changes based on the findings of internal audits or risk assessments.

- a) Review of the policy to ensure that it is up to date and in compliance with relevant standards and regulations.
- b) Consultation with key stakeholders to identify any changes or updates required.
- c) Review and update of anti-corruption measures and procedures.
- d) Approval of the updated policy by senior management.

Dedicated Responsibilities

Our Board of Directors, senior management and all employees share responsibility for ensuring compliance with this Anti-Corruption and Bribery Policy. The Board of Directors is responsible for overseeing the company's overall compliance with anti-corruption and bribery laws and regulations and for providing guidance and support to senior management in this regard. Senior management is responsible for implementing and enforcing this policy, ensuring that all employees receive adequate training on anti-corruption and bribery and for establishing appropriate internal controls and monitoring procedures to prevent and detect any potential breaches of this policy.

Stansomatic, 24-04-2023

Søren Bahnsen
CEO