

IB Invest – Anti-Corruption Policy

Version 1

Adopted by the Board of Directors of IB Invest on 2021-06-15

Introduction

IB Invest is committed to ethical and transparent business free of bribery and corruption.

Bribery is defined as attempts to gain advantages by giving someone money, presents, or something else that they want.

Corruption includes a wide variety of illegal or dishonest behaviour, especially by people in positions of power. Examples of such is: misuse of power for personal gain, bribery, and misuse of company assets.

Bribery and corruption can take many forms and include groups of people as well as individuals.

Our principle

IB Invest will never participate in improper transactions such as bribes or facilitation payments. No employee, business partner, advisor, or consultant should participate in paying or receiving bribes or in any way participating in, or expressing acceptance towards extortion, fraud, embezzlement, illegal financing of political parties, facilitation payments or other business benefits in exchange for gifts or personal favours. All employees, business partners, advisors and consultants should be cautious and take responsibility for ensuring that bribery and corruption is prohibited.

IB Invest will not participate in financing political parties or political lobbying on national or EU-level. All memberships in industry organizations such shall be disclosed publicly.

The above is clearly stated in our Code of Conduct that all employees, business partners, advisors, and consultants are obliged to understand and comply with.

IB Invest's board of directors is responsible for ensuring that no corruption or bribery of any kind occurs within the organisation and that contractors, suppliers and business partners understand and respect IB Invest's practices. Any discovered breaches shall be reported openly and transparently.

Breaches

Any breaches of this Policy should be reported to the board of directors. One should always be given the possibility to report breaches anonymously.

Reported or suspected breaches are taken seriously and are investigated accordingly. Confirmed breaches of this Policy will be met by disciplinary actions such as warning, dismissal, or reporting to the police.

Examples of Behaviour that Constitute a Breach of this Policy

- Selecting a supplier with whom you have a personal relationship because you expect personal favours in return and/or have been given personal favours prior to the deal.
- Giving, or receiving gifts to or from a customer, or supplier, that exceeds the reasonable value defined in the Code of Conduct and/or could affect business transactions (business benefits in exchange for personal services)
- Giving a financial donation to a non-profit organisation such as a political party with expectations of business benefit in return (political lobbying)

- Unofficial or questionable payments to officials to speed up bureaucratic processes (facilitation payments)

Deliberately trying to deceive another party or abuse a position of power to gain material advantage (fraud)