

 Alteams	Site: Alteams Group Subject: Alteams Anti-Corruption Policy	Published: 7.3.2025 Code: 1104 Revision: 1 <hr/> Page: 1/2
--	--	---

In all our operations, we adhere to Alteams' Code of Conduct, whose principles form the foundation for responsible and sustainable business practices. The purpose of this Anti-Corruption Policy (hereinafter referred to as the "Policy") is to clarify the Code of Conduct and emphasize the importance of anti-corruption efforts.

Alteams has zero tolerance for corruption in all its forms. This applies to both our own operations and our relationships with partners. We do not conduct business with parties that do not comply with or support our Code of Conduct and Anti-Corruption Policy.

Alteams' top management is responsible for this Policy, including its annual review, updating, and approval. The Policy applies to everyone working at or on behalf of Alteams.

Corruption refers to any misuse of power or position for personal, financial, or other gain. It can occur in many different ways. This Policy defines the various forms of corruption and provides guidelines for identifying and preventing them.

Bribery and gifts

Bribery refers to the offering, promising, giving, or receiving of a financial or other advantage, i.e., a bribe, to induce the recipient or another person to act illegally or improperly in the performance of their duties. It also includes rewarding illegal or improper conduct and situations where the recipient of the benefit accepts the benefit and acts illegally or improperly as a result.

Bribery as described above is strictly prohibited. Even if a bribe is not accepted, the simple act of offering it is a violation of this Policy.

A bribe differs from a gift in that a gift refers to an item, service, or other benefit given voluntarily without compensation or expectation of a return favor. Giving gifts must not influence decision-making or create conflicts of interest.

Alteams has set a maximum value for gifts given to or received from third parties, which is 100 EUR / 1000 CNY / 500 PLN. Exceptions to this rule can only be made with the approval of the Group CEO, in which case the value of the gift may be up to 500 EUR / 4000 CNY / 2000 PLN. If local laws impose stricter requirements than those mentioned above, Alteams must comply with them.

Offering and receiving gifts during contract negotiations or competitive bidding process is prohibited.

Giving gifts to representatives of the state, government, or similar entities, as well as receiving gifts from these entities, is prohibited.

Facilitation payments generally refer to small, unofficial payments made to ensure or expedite routine actions by public officials, such as customs clearance or tax inspections. Offering facilitation payments is strictly prohibited. Local practices in different countries do not allow any exceptions to this rule.

Conflict of interest

A conflict of interest refers to a situation where a person's personal interests, relationships, or external obligations may affect their ability to act impartially and in the best interest of the organization.

 Alteams	Site: Alteams Group Subject: Alteams Anti-Corruption Policy	Published: 7.3.2025 Code: 1104 Revision: 1 <hr/> Page: 2/2
--	--	---

Examples of conflict of interest situations can include:

- Financial benefit received by an employee that may influence their decision-making.
- A position of trust held by an employee that may conflict with the company's interests.
- A personal or professional relationship of an employee with a party that may affect the company's operations.
- A side job or business activity of an employee that may create a competitive situation or interfere with their primary employment.
- Entering into a business relationship on behalf of the company with an entity where the decision-maker is a family member or close associate of the employee.

All employees must report any potential or actual conflicts of interest to their supervisor or a representative of the company's management.

Hospitality

Hospitality refers to the hosting and entertaining of guests for the purpose of nurturing business relationships. Hospitality is considered a gift if an Alteams' representative is not present at the aforementioned event.

Alteams' employees must carefully consider accepting hospitality offered by another party and ensure that such hospitality does not affect their independence and decision-making. Accepting hospitality is prohibited during contract negotiations or competitive bidding processes.

Reporting Violations

In accordance with the Whistleblowing Policy, our employees have a duty to immediately report any suspected violations or activities contrary to this Policy to Alteams' Ethics Committee. Matters concerning suspected misconduct will be investigated impartially and confidentially.

Consequences

Actions contrary to the Policy may result in varying degrees of consequences depending on the situation. In serious cases, violations of this Policy may lead to a warning or termination of employment. Liability for damages or other legal consequences may also be possible if the violation is unlawful in nature.



Arto Lehtinen
 CEO
 Alteams Oy