



Polar Electro Anti-Bribery & Anti-Corruption Policy

Purpose and Scope

This document clarifies Polar Electro's policy to prevent bribery, corruption, extortion, and embezzlement across all the company's operations.

This policy applies globally to all employees, contractors, and third parties acting on behalf of Polar Electro.

Policy statement

At Polar Electro, there is zero tolerance for bribery and corruption. No improper advantage may be promised, offered, requested, given, or accepted.

Bribes, kickbacks, facilitation payments, and any form of undue advantage are strictly prohibited.

Polar Electro complies with all applicable anti-corruption laws and regulations globally.

Ordinary hospitality

Ordinary hospitality is considered acceptable. It refers to customary, socially appropriate behavior, such as welcoming guests or visitors, in a way that maintains balance in the relationship and does not create any sense of obligation for the host. Low-value promotional items or gifts may also be regarded as ordinary hospitality, provided they are given or received without any intention of gaining advantage on either side.

The acceptable maximum value for ordinary hospitality is 50 EUR or equivalent, unless local employment policies define a lower limit.

Ways to maintain and monitor the policy

All transactions must be accurately recorded. Off-the-books accounts are prohibited.

- Mandatory Code of Conduct training for employees and the supply chain to recognize and prevent bribery risks.
- The confidential reporting channel "Speak Up" is available internally and externally for reporting suspected violations. Whistleblower protection is ensured.
- Internal and external audits are conducted to assess compliance and detect misconduct.
- This policy is reviewed regularly and updated to reflect legal and operational changes.

Disciplinary actions

Violations against the Polar Electro Anti-Bribery & Anti-Corruption Policy may result in disciplinary measures, including employment agreement termination, business agreement termination, and legal action.