

## **ANTI-CORRUPTION AND CONFLICT OF INTEREST PREVENTION POLICY**

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SKONTO GROUP is committed to perform business in compliance with the principles of honesty and transparency. SKONTO GROUP does not support and permit corruption or bribery either in the public or private sector.

SKONTO GROUP Anti-Corruption and Conflict of Interest Prevention Policy determines the main principles to be complied on a daily basis by the management, employees, consultants, agents or other third parties working in the companies or at the facilities of SKONTO GROUP, or on behalf of SKONTO GROUP. The purpose of the Policy is to provide guidance on the relevant and ethical anti-corruption and conflict of interest prevention in particular daily situations.

### **Main principles of the anti-corruption and conflict of interest prevention:**

In cooperation with customers, suppliers, state authorities and others it should be considered that

- SKONTO GROUP does not support and does not permit bribery and corruption either financially or in any other forms and any transactions or relations.
- Use of funds or other assets of SKONTO GROUP for any unlawful or inappropriate purposes is strictly prohibited.
- SKONTO GROUP is aware of the fact that even a hint or indirect indication on corruption or bribery may negatively affect the reputation of SKONTO GROUP and minimize public trust.
- Employees of SKONTO GROUP should always perform everything possible in order to avoid situations, which may cause even the smallest suspicions on corrupted behaviour.
- Neither employee shall suffer from any negative consequences, when refusing to give or accept bribes or otherwise get involved in corrupted activity, even if such refusal results in the loss of any transaction or other benefit for SKONTO GROUP.

In order to prevent corruption and conflicts of interest during the daily activities of the companies, the following should be observed:

- **Conflicts of Interest.** Everyone should avoid situations, when relations with any other organization or person could affect the ability to make decisions as a representative of SKONTO GROUP and in the interests of SKONTO GROUP. Any potential conflict of interest should be reported to the management of SKONTO GROUP.
- **Selection of suppliers.** Selection of sub-contractors, suppliers of materials, service providers, consultants or other cooperation partners shall be based on careful selection and in accordance with the internal procurement policies. Selection of suppliers shall not be affected by receipt of gifts or showing of any other kind of favour.
- **Cooperation with agents.** When establishing relations with agents or other third parties who are acting on behalf of SKONTO GROUP, the careful examination of them should be performed and approval of the top management of the company should be received for such cooperation. Any commission fee which is paid to the agent, should be related to the volume of the service actually performed by it and shall correspond with the market conditions.
- **Joint ventures and foundation of general partnerships.** When entering into joint ventures or establishing a general partnership, it is important to make sure that the selected partner is not involved

in the activities being related to corruption or bribery, in order not to cause important consequences for operations and reputation of SKONTO GROUP.

Furthermore, when entering into joint ventures or agreements with competitors, it is done in accordance with competition law and only in cases where company is incapable individually perform a specific work or project, but not with the purpose of limiting competition.

- **Commencement or termination of legal employment relations.** All employees who are responsible for selection of employees, career growth or professional development ensure human resources management procedures and processes based on competence. Favouritism in relation to relatives (nepotism) or friends (chronism) is not permitted.
- **Showing or giving a favour.** Favour or gifts are not offered or accepted to influence any decisions. Exception is representation gifts and symbolic\* gifts, which are presented on birthdays and according to the national traditions. However, also such a gift or favour shall never be offered or accepted, if that can cause a wrong idea or if it is prohibited by the policy of the employer of the giver or receiver.

*\* the "symbolic gift" for the purpose of this Policy means goods, gifts or services, the value of which does not exceed EUR 50.*

- **Promotional payments.** SKONTO GROUP does not permit any payments to public officials in order to accelerate or facilitate to perform any processes, such as more rapid receipt of permits, acceleration of customs procedures or any other bureaucratic activities that the payer has lawful right to, in the direct or indirect way, as SKONTO GROUP considers it as a bribery.
- **Charity, investments and sponsorship.** SKONTO GROUP makes donations or sponsorship in accordance with the SKONTO GROUP Public Support Policy which is publicly available on the SKONTO GROUP website. Donations, sponsorships or investments are made to support and promote public benefit projects, but under no circumstances in order to conceal bribery and make the beneficiary of the donation to purchase services of the company.
- **Political neutrality.** SKONTO GROUP is politically neutral and does not materially support any political parties, campaigns or specific politicians. Employees of the company participating in political activities do it only personally and express only their personal position.

## Reporting

Everyone has a duty to report in case of any suspicions on bribery or corruptive activities or attempts thereof in cooperation with any of the companies of SKONTO GROUP, or about possible or actual violations of this Policy.

You may report using Internal Whistleblowing system or any other communication channel with SKONTO GROUP:

- by filling in a special form on the SKONTO GROUP website: [www.skontogroup.com](http://www.skontogroup.com);
- by sending the e-mail to [report@skontogroup.com](mailto:report@skontogroup.com);
- by calling to the phone number 67096120.

SKONTO GROUP undertakes to treat the whistleblower's data confidentially and to protect the whistleblower appropriately against any repressive measures. Reporting on any violations or suspicions about violations will not have any negative consequences on the further mutual cooperation.

## The policy is reviewed and approved:

Riga, Latvia, year 2020

SKONTO GROUP  
Chairman of the Board

Andris Vilcmeiers