



# ANTI-CORRUPTION COMPLIANCE POLICY

This policy provides guidance to identify and prevent the risk of fraud in our organization. Edge One Solutions adheres to a zero-tolerance approach to any form of corruption. Such conduct is contrary to our commitment to being a responsible and trustworthy company.

August 2022

## Purpose of the document

Executives play a key role in creating an organizational culture in which there is no chance for corruption to arise and it is not accepted in any form.

The Anti-Corruption Compliance Policy is widely communicated and promoted among the employees of our organization, supported by training initiatives to enable proper understanding and use of its principles in daily work.

The Anti-Corruption Compliance Policy is a document open to suggestions from all of us. It can be updated in response to the needs and changes occurring within our organization.

## Aim

Edge One Solutions is committed to conducting business in compliance with our company values in order to build long-lasting and strong relationships based on openness and trust. We are committed to complying with all regulations in the countries in which we operate.

To help our employees fulfill this commitment, we have identified, described and clarified the illegal nature of various types of corrupt practices.

We have also defined standards and rules for activities that may lead to corrupt practices.

Every action we take is to promote an attitude at the heart of which is the belief that acting with integrity promotes competitiveness and is an expression of social responsibility.

## Recipients

This Policy applies to all employees, associates and business partners acting on behalf of Edge One Solutions, and applies to all activities and transactions in Poland and all countries in which we operate.

All personnel are required to familiarize themselves with and comply with this Policy. In addition, the Management is responsible for supervising employees' compliance with this procedure.

Any violation to the Policy, regardless of the employee's place of employment or the location of our organization's operations, may lead to disciplinary sanctions.

The Anti-Corruption Policy is made available to employees via the Intranet and is published on Edge One Solutions' external websites generally accessible to employees.

## What is bribery, corruption, and a bribe?

Corruption is the abuse of one's official position or influence to obtain unofficial and unwarranted benefits. Corrupt activities include bribery and embezzlement.

Bribery is the offer, promise, solicitation or agreement to receive a bribe, reward, advantage in any form and of any value.

A bribe is an incentive or reward offered for the purpose of obtaining a professional or private benefit. The mere offering of a bribe, regardless of whether it is accepted, is sufficient to qualify an act as the perpetration of a crime.

Benefits are considered not only material goods, but also invitations, classified information, preferential treatment, among others.

## Contact

## Guidelines and rules of conduct in business relations

Invitations to events, gifts, travel and lodging can all fall within the domain of corruption risk and convey the impression of impropriety.

Such gratuities can support the process of establishing, developing and maintaining business relationships. However, we do not wish our employees in such situations to feel exposed to charges of sustaining relationships by engaging in behavior that does not comply with applicable norms and regulations.

Therefore, before an employee accepts a gift or offers it to someone, they are obligated to follow the rules below.

## Entertainment events

They are treated as an opportunity to build relationships with customers or suppliers. These include conferences, events organized by Edge One Solutions, etc.

Offering or accepting an invitation is only possible if an employee of our organization is present at the event, and the event itself is organized in a legal and socially acceptable manner.

Coverage of the costs of travel, lodging, meals and attendance at the event by business guests is warranted by the company's business objectives.

Information on financing such events is included in HR and administrative procedures.

## Gifts and presents

These are a display of appreciation and good relations or often part of a local tradition or culture. Employees of our company may not solicit gifts or presents.

However, this policy does not prohibit the receipt of reasonable gifts from third parties or the offering of gifts provided that they are intended to establish cordial relations, enhance the company's image or showcase products and services.

The gift is to be of symbolic value and must not be in the form of cash or cash equivalents. The gift must also be offered to the business partner and not to third parties.

The exceptions are company gadgets with the Edge One Solutions logo which constitute marketing materials of our company and have relatively little material value.

## Donations to charity and political parties

Our company operates in compliance with our Corporate Social Responsibility ("CSR") policy and strives to exert a direct, sustainable and positive impact on the communities in which it operates.

Charitable donations take place only if the CSR strategy is implemented and the charitable purposes are indicated therein or are related to local community activities.

Edge One Solutions does not provide any donations or contributions to political parties.

## Obligations

Our employees are obligated to familiarize themselves with and comply with this Policy.

It is also the responsibility of our employees to prevent, detect and report any corrupt activities.

Should an employee suspect that such a violation has occurred, they shall immediately report it to their supervisor or refer such information to the HR department.

## Contact

The anti-corruption policy extends also to our contractors, clients, business partners and cooperating companies, who are obliged to act with integrity.

Corrupt intentions and activities are prohibited.

## Reporting violations

Employees can without fear report their concerns about violations of the Anti-Corruption Compliance Policy to their supervisor or HR department through all channels of communication within our company.

They can also seek counsel when there is a suspicion of a violation of these principles.

Each report is treated confidentially and is investigated with due diligence.

## Documentation and supervision of procedure

Edge One Solutions is guided by the principle of full transparency in its operations.

We apply relevant control processes and periodically the Management Board and HR team monitor and review the compliance with this Policy.

The Management also undertakes to maintain records and accounts as well as security audits in accordance with applicable regulations and procedures.

### Contact



# EDGE ONE: SOLUTIONS

Each employee is obligated to familiarize themselves with the contents of this Policy and to comply with it.

Any failure to comply with this procedure will be investigated individually.

All remarks, suggestions and inquiries related to this Policy should be addressed to: [compliance@edge1s.com](mailto:compliance@edge1s.com)

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