

Anti-bribery and corruption policy

INTRODUCTION

Ardor OÜ is committed to the highest norms of business conduct. We act in a responsible way, which is based on our Corporate Social Responsibility Policy. We advocate free and fair trade, striving for open and fair competition within the legal frameworks of the countries where we operate.

Ardor OÜ has a clear statement against bribery and corruption:

- We do not accept bribery or corruption in any form.
- We do not offer, authorise or pay bribes or anything of value to obtain or retain business, or to encourage or reward a decision.
- We avoid an interest or situation that conflicts, or may appear to conflict, with our professional duty.

CORRUPTION

- Corruption is the abuse of an entrusted power for private gain.
- We do not contribute financial means to any third party in a way that could constitute negligent financing of corruption.

BRIBERY

- Bribery is the offering, providing, authorising, requesting, accepting or receiving of a financial or other advantage in order to encourage improper performance or to misuse a person's position. A bribe can be anything of value and does not necessarily involve money.
- We shall not offer, provide, authorise, request, accept or receive a bribe either directly or indirectly, including through any third party.

CONFLICT OF INTEREST

- A conflict of interest occurs when financial or other personal considerations may – or may appear to – affect an employee's loyalties, professional judgement, and performance of duty.
- We act always in Ardor OÜ's best interest and exercise sound judgement, unaffected by private interests or divided loyalties.

FACILITATION PAYMENTS

- Payments made to government officials to encourage or ensure that routine procedures are carried out or speeded up.
- We do not make or accept facilitation payments.

GIFTS AND BUSINESS HOSPITALITY

- Gifts and business hospitality are only offered or accepted within the limits of local legislation and the guidance relating to this Policy.
- We do not offer or accept gifts, travel, payment or hospitality to encourage or reward a decision.
- We can only accept business hospitality and gifts proposals if they are open, reasonable, demonstrate a clear business objective, are appropriate for the nature of the business relationship.

DONATIONS OR SPONSORSHIPS

We do not permit charitable or political donations or sponsorships as a way of concealing a bribe.

DOCUMENTATION

- We keep accurate and transparent financial books and records.

BREACHES AGAINST THE POLICY

- Any Ardor OÜ's employee who suspects violations of this Policy must speak up and raise the issue to their manager. When an employee does speak up, Ardor expressly forbids any form of retaliation.
- Any action or behaviour that could be seen as a violation of this Policy must be promptly and appropriately handled, either by being corrected or reported for further handling.

SCOPE

This Policy is applicable to every employee of Ardor OÜ and its Board of Directors.

ROLES AND RESPONSIBILITIES

Each Manager is responsible for ensuring that this Policy is duly communicated and implemented within their team, and that the team members understand and follow this Policy. Every employee bears the responsibility for violating any principle of Ardor's Corporate Social Responsibility Policy.