



TOTEME

Anti-Corruption Policy 2024

INTRODUCTION

- Corruption is widely known to distort markets, undermine the law, damage government legitimacy and hurt economic development.
- Some of TOTEME's operations take place in challenging environments and countries where corruption is more likely to occur. It is therefore important to acknowledge that TOTEME can be affected by acts of corruption.
- Corruption is closely linked to system weaknesses and mismanagement, but these factors can be tackled if they are given the importance they deserve.
- It is therefore crucial to identify and address corruption challenges at all levels of the organization.

ABOUT THIS POLICY

THIS POLICY

- This Anti-corruption Policy is a reference document to help TOTEME staff members and business partners avoid and handle corruption-related issues.
- The aim of the policy is to ensure a non-corrupt business environment throughout our company's value chain.
- Corruption prevention is the responsibility of all TOTEME employees.

DEFINITION

- Corruption can happen in the form of bribes, fraud, waste, abuse, and misconduct. Generally speaking, corruption has to do with unethical behavior.
- At TOTEME, we define corruption as the abuse of power for the benefit of an individual or group.
- Some activities might be seen as corruption by some individuals, but not by others. Similarly, some governance practices might be acceptable in local contexts from legal and cultural perspectives yet be considered illegal or illegitimate in others.

SCOPE

- TOTEME has zero tolerance for corruption in all its forms.
- We believe that addressing corruption internally and externally will cement our reputation as a professional and trustworthy organization.
- This policy applies to all of TOTEME's business dealings and transactions in all the countries in which the company and its business partners operate.

It must be followed by TOTEME's:

- Board of directors
- Executive management team
- Managers
- Employees, including temporary employees

DEFINITIONS

At TOTEME, we define corruption as an act that, through unethical behavior and abuse of power, brings material and immaterial benefits to an individual or group, including wealth, an improved reputation, political capital, or access to services.

Corruption may occur in many forms, including but not limited to:

- **Bribery**
When money, gifts or other incentives are offered to an individual or group in exchange for something another one wants.
- **Kickback**
A form of bribery happening during a commercial exchange where the supplier gives a reward to the customer for ordering goods or services from them.
- **Embezzlement**
The theft of resources that one has access to (e.g. a company safe or bank account) for private use.
- **Extortion**
Obtaining something by force, threats, or inappropriate demands.
- **Favoritism**
The unfair favoring of a person or group at the expense of others.
- **Unnecessary waste**
Including inefficiency, poor administration, and lack of supervision and coordination.

EMPLOYEE COMMITMENT

THIS POLICY

- Under this Anti-corruption Policy, a bribe includes financial or other types of benefits that are promised, offered, requested, accepted, given or received with the expectation that a specific activity should be performed.
- As a TOTEME employee, you are not allowed to accept bribes under any circumstance. You are equally not allowed to offer bribes for or on behalf of the company to any organization or person, whether employed privately, in the public sector, or by another type of organization.
- Facilitation payments or bribes are not allowed when working for or acting on behalf of TOTEME.
- Whether an action constitutes a bribe is determined by the standards set in this document or elsewhere in TOTEME's policies.
- Any local practice or custom will be disregarded unless explicitly permitted or required in writing by local law.

DEFINITION

- TOTEME does not allow its employees or other representatives to request, receive, accept, arrange, offer, or give any kind of advantage, financial or of another kind, from/to a business partner, contractor, or any other person/organization in connection with the company's business and/or collaborations.
- The term advantage here includes but is not limited to:
 - Individual gifts
 - Loans, money, fees
 - Travel
 - Services
 - Bonuses
- You and your immediate family must not give, guarantee or accept loans from any person or organization with whom you do business when you work for TOTEME.

SCOPE

- As a TOTEME employee or representative, you cannot accept individual gifts.
- In some countries where TOTEME is active, it is considered an act of hospitality to give gifts at the time of meeting or when celebrating holidays. If this happens to you, you must hand the gift(s) to TOTEME. It/they will then be shared with all TOTEME employees.

PREVENTION

- At TOTEME, we actively work to comply with all laws that are in force in all the countries where we operate.
- You should always strive to assist the company's anti-corruption efforts by ensuring that all company operations are shaped by honesty, transparency, integrity, and fair play.
- All TOTEME employees must receive yearly training on this policy.

COMPLIANCE

- TOTEME is set on ensuring that the objectives of this Anti-corruption Policy are met. We will therefore ensure that all parties concerned are informed about and compliant with this policy.
- It is your responsibility to make sure that you understand the contents of TOTEME's Anti-corruption Policy and that you observe these guidelines in your daily work.
- Employees who read and sign this policy not only confirm they have read and understood its contents but also that they commit to comply.
- If you have questions concerning the meaning or application of this policy, please contact a relevant manager, the People & Culture team, or the Sustainability Director.

VIOLATIONS

- TOTEME's Anti-corruption Policy encourages following the law, which is why any deliberate violation of this policy may be considered or lead to a criminal act.
- Violations of the Anti-corruption Policy may therefore lead to receiving a warning or disciplinary measure, or even employment termination or facing criminal charges.
- As a result of corruption acts, the company may be fined, face lawsuits or investigations, or suffer damages to its reputation.
- Any violation or suspicion of violation of this policy should be reported to a relevant manager or anonymously through our whistleblowing service.

