

Document NOTE Anti corruption policy	Type of document Demand	Examined by Karin Brunberg	Document responsible Johannes Lind Widestam
Document number 2013006	Revision 3	Date 15 November 2018	Approved by Johannes Lind- Widestam

NOTE Anti corruption policy

NOTE is a member of Global Compact and supports its ten principles.

Corruption hampers economic development, inhibits competitiveness and undermines both the rule of law and the democratic process in a society. NOTE should work against corruption in all its forms, including extortion and bribery.

Main principles

- NOTE encourages employees to resolutely counteract all forms of corruption, blackmail and extortion. Simultaneously, NOTE expects the corresponding attitudes from its customers and suppliers.
- Gifts shall be made openly. They shall not take the form of cash, must have a clear, legitimate basis in local business and shall have a minimal cash value.
- Payment of travel, dinners and arrangements for customers or others shall have a clear business basis and shall take place openly.
- NOTE have clear procedures for attestation, payments, approval of credits, changes of prices in systems etc. to avoid risk of incorrect behaviour.

Handling of responsibility

NOTE's Managing Directors are responsible for implementing the anti corruption policy. Among other things, necessary caution must be taken in relation to NOTE's stakeholders, such as for example business partners and suppliers.

NOTE units must be prepared for the risk of being involved in corruption. Special caution must be taken in countries where Transparency International's corruption index and other relevant external reports indicate a high risk of corruption.

If NOTE is subjected to inappropriate behaviour, this shall be met with:

- A firm and clear stance against corruption.
- Professionalism and a high ethical standard.
- Support from NOTE's Group Management.

Reporting suspicious corruption

On yearly basis all units within the group carry out a self-assessment, ICQ, which among other things address validity of procedures to ensure control of financial transaction.

Whistle-blowing function

If employees experience matters that may conflict with rules and regulations, NOTE's policies or Code of Conduct, they are urged to raise their concern according to communicated NOTE Whistleblower Policy.