

5 Prohibition of Corruption and Bribery

Brytec competes for contracts awarded by public authorities and state-owned enterprises. Therefore, it is of utmost importance that Brytec strictly complies with all applicable laws and regulations governing public procurement. This includes, in particular, provisions that prohibit any attempt to unduly influence government officials or private business partners.

Brytec does **not tolerate any form of corruption** in its business relationships—**anywhere in the world**. Our success is based on the quality and innovative features of our products, our customer-oriented service, and the expertise of our employees. **All payments** made by companies within the Brytec Group must **serve a legitimate purpose** and **be properly documented**.

There are numerous international anti-corruption standards that have been implemented at the national level. These laws and regulations prohibit bribery and corrupt conduct in any form. Among them are the **UK Bribery Act** and the **US Foreign Corrupt Practices Act**. These laws apply globally, are strictly enforced, and carry serious legal consequences.

Every employee is required to report **any suspected cases of corruption** to Brytec's Legal and Compliance Department. **Corruption is not a minor offense**—nor is extortion. Both are illegal. Employees must therefore refrain from any form of corruption, whether **direct or indirect**. This applies especially to attempts to influence decision-makers at business partners or in the public sector by offering, promising, or granting improper advantages, or by approving, authorizing, or instructing such **actions through third parties**.

Gifts, invitations, and other benefits must not be offered or promised if they could be perceived as an attempt to improperly influence a public official or business partner.

In general, **employees should be alert to signs of unlawful conduct**. This also includes the careful selection of business partners.

5.1 Handling with gifts and invitations

The most common form of corruption is bribery. **Brytec does not tolerate any form of bribery**, whether directly or indirectly through third parties. **Bribery** is the act of offering, promising, or granting money, gifts, or other advantages to a public official or an employee in the public or private sector in order to obtain improper advantages. **Bribery is a criminal offense worldwide.**

To avoid such cases and to consider local circumstances, employees are prohibited from:

- offering or accepting **excessive gifts or invitations to entertainment events**,
- offering or accepting **excessive travel expenses**,
- making or accepting **inappropriate donations, sponsorships, or memberships**,
- making or accepting **inappropriate monetary payments** (*including so-called "facilitation payments"*),
- offering or accepting any other **inappropriate advantages** from or for current or potential business partners.

In many cultures, gifts and invitations to events are an important part of developing and deepening business relationships. Special care must be taken when such payments or advantages have no contractual basis. Gifts are considered inappropriate if **they exceed a value of approx. EUR/CHF 100 per business partner of half a year exceeded.**

"Business partner" refers to the company (or individuals) with whom a business relationship exists, not the employee personally.

Inappropriate gifts or invitations should be politely declined, unless local regulations provide otherwise.

Under no circumstances may **gifts or invitations unduly influence the recipient's decision-making or give the appearance of improper influence.** Therefore, each employee must ensure that gifts and invitations are **only offered or accepted in a reasonable and appropriate manner.**

Employees must **not offer or grant any gifts, invitations, or monetary payments to authorities, officials, other public officeholders, or representatives of public organizations** if these could improperly influence their decisions or actions.

In cases of **uncertainty regarding value limits or the appropriateness** of gifts or invitations, every employee should consult with their responsible supervisor. The decision reached must be **properly documented.**

5.2 Sponsorships, Donations, Charitable Events, and Memberships

Sponsorships, donations, charitable events, and memberships must always be carefully reviewed to ensure that they support the legitimate objectives of the company.

Such contributions must **not be promised, offered, or granted** in order to **obtain improper business advantages** or for any other **unethical reasons**.