



ANTI-BRIBERY AND CORRUPTION POLICY

Recee AS is committed to conducting our business with integrity and based upon ethical best practices and principles, including anti-bribery and anti-corruption compliance standards. Reccee AS has zero tolerance for bribery and corruption. In addition to the need to follow the law, our rejection of bribery has important business benefits, including maintaining our corporate reputation and retaining the confidence of customers and third parties with whom we do business.

The prohibitions against bribery and corrupt conduct apply regardless of whether it takes place in the public sector or in the private sector. Bribery is illegal in both contexts. You must not engage in bribery (either giving or receiving things of value to gain an improper business advantage) in connection with any of the Reccee AS's dealings or activities involving private or public companies, organizations or individuals. Particular care should be taken in dealings or activities involving government or public officials, but it is just as important to remember that private entities and individuals may also be the subject of bribery.

Recee AS shall at all times comply with the most stringent anti-bribery and anti-corruption laws and regulations (as may be amended from time to time) including but not limited to:

- i. Any Norwegian applicable laws and regulations,
- ii. The United States Foreign Corrupt Practices Act,
- iii. The UK Bribery Act,
- iv. The Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transaction, and
- v. The United Nations Convention Against Corruption

In addition, the Reccee AS will require, through contractual clauses, due diligence and training, that third parties who act on our behalf, including service providers, consultants, distributors, contractors, agents, representatives and suppliers, similarly abide by this policy.

Recee AS shall provide all employees, officers and directors training regarding anti-bribery and corruption upon their joining the company. In addition, focused ethics and anti-bribery and corruption training will be provided periodically to applicable professional functions.

Adopted 09.12.2020