

Anti-corruption / No bribes

These guidelines for Glasspaper anti-corruption / no bribes define how Glasspaper Group AS's employees and employees of our subsidiaries should behave in the day-to-day business regarding anti-corruption and no bribery and reflect our core values and general corporate culture.

1. Objectives

Glasspaper expressly prohibits bribery and corruption in all its forms and for all intents and purposes, whether in the case of government officials or representatives of suppliers or customers.

Gifts, entertainment and charitable donations can be misused and can be considered inappropriate transfers of value, especially where public officials are the beneficiaries. Glasspaper employees must follow current guidelines and be aware of the risk of bribery and corruption related to such persons.

2. Scope

This policy applies to all Glasspaper employees, including employees, directors, and owners.

3. Definitions

In connection with this policy, the following definitions apply:

3.1 Public official — an elected or appointed official, or any other official or employee of local, national, and state legislatures, executive branches or other government agencies, commissions, boards, governments, public funds or other state or quasi-government entities, including:

- a) Any manager or employee of the Government (including, but not limited to, military personnel), or any of its departments, agencies, incorporated entities or political subdivisions (including, but not limited to, wholly or partially state-owned and state-controlled enterprises).
- b) Any director or employee of a legal entity or joint venture controlled (qualitatively or quantitatively) or significantly owned by a government (including, but not limited to, a military personnel) or any of its departments, agencies, political subdivisions or incorporated entities (including, but not limited to, state-owned and state-controlled enterprises).
- c) Any manager or employee of a public international organization.
- d) Any person representing, or acting on behalf of, or in an official capacity of, any government or any of its departments, agencies, political subdivisions or incorporated entities (including, but not limited to, state-owned and state-controlled enterprises), even if they are in honorary capacity (honorary member).
- e) Any political party, party representative or candidate for political office.
- f) Any member of a royal family or Sámi-government (Sámi Parliament).

3.2 An undue financial or other undue advantage means that something that has any value or tangible benefit at all covers, but is not limited to:

- a) Cash and cash equivalents) Gifts (including, but not limited to, gifts or endorsements that form part of a local custom; weddings, funerals and personal gifts; jewellery)c) Political donations

- d) Donations to charities or foundations on behalf of an official or his/her family
- e) Entertainment (including, but not limited to, sport events as defined herein, meals and tickets to venues and events, including events sponsored by third parties)
- f) Travel and travel related expenses
- g) Accommodation and costs
- h) Ownership rights or interests in joint ventures or other entities
- i) Inflated or exaggerated contract prices) Under market rent or rental
- k) Loans
- l) Offers of employment (whether long-term or temporary), consultancy fees, speaking fees or fees, scholarships or internships.

4. No bribes

Corruption is the abuse of trusted power for private gain. In these guidelines corruption includes active (bribery) and passive (receiving bribery), national as well as international, public and private business practices involving:

- request, offer, promise, give or accept, directly or indirectly,
- an undue financial or other undue advantages or purposes,

to or from a public official, political party or private employee, third party or other person who distorts the performance of any duty or activity required by the recipient of the improper benefit.

It is important to note that it is irrelevant whether such an advantage has been requested, offered, promised, given or accepted to acquire and/or retain business or other inappropriate advantage in business operations.

5. Facilitation payments

Facilitation payments (so-called speed payments) involving offers of a negligible amount or benefit to a public official to speed up or secure a "routine state act" are also prohibited.

Examples of such "routine state actions" are, but are not limited to, payments such as: - Allow entry/exit to/from a country, even when all documentation is in order;
Expedite government checks, licenses or the issuance of permits

If a Glasspaper employee is contacted with a request for facilitation payment, he or she must:

- Reject the request and not pay, see this policy that prohibits facilitation payments;
- Question the reasons and legitimacy of the payment and ask if you want to receive a receipt; and inform his superior at the first opportunity.

6. Physical risk or safety situations

6.1 The only exception to the prohibition against facilitation payments are situations where serious health or safety risks are in fact or imminent.

6.2 If an employee of Glasspaper is requested in such circumstances, facilitation payments can be made on an unprecedented basis, if it is necessary to ensure state services (e.g. police protection, medical evacuation) in response to a serious health or safety situation or; if the person reasonably feels that he or she is under serious duty or at imminent risk of serious harm to his or her personal

integrity or physical safety and no other reasonable options are available.

6.3 If an accommodation payment is made in such exceptional circumstances, it must be immediately reported and documented in detail by the employee's superior.

6.4 Facilitation payments must be properly entered into Glasspapers systems .

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