



Anti-Corruption Policy

1. Purpose and scope

1.1. The purpose of this policy is to provide guidelines and procedures for preventing, identifying and handling corruption and bribery in STIM (hereinafter referred to as “the company”).

1.2. This policy applies to all employees, board members, consultants, agents, suppliers and other business partners representing or acting on behalf of the company.

2. Definition of corruption

2.1. Corruption is the abuse of trust, power or position for personal, economic or other gain. This includes, but is not limited to, bribery, extortion, nepotism, embezzlement and money laundering.

3. Zero tolerance for corruption

3.1. The company has a zero tolerance for corruption in all its forms and is committed to acting professionally, fairly and with integrity in all business transactions and relationships.

3.2 All employees and business partners must comply with this policy and applicable laws and regulations prohibiting corruption and bribery in the countries where the company operates.

4. Guidelines for gifts and representation

4.1. Gifts and representation can sometimes be part of business culture, but they must not be expressions of bribery or corruption. The company allows moderate gifts and representation that are in line with applicable laws and culture, and that cannot be interpreted as bribery or corruption.

4.2. Employees and business partners must never offer, give, request or receive any gift, payment, hospitality or other benefit in exchange for business advantages or decisions.

4.3. All gifts and representation offered or received must be reported to the nearest manager and registered in the company’s register for gifts and representation.

5. Retention requirements and reporting

5.1. Employees and business partners who suspect corruption, bribery or violation of this policy have a duty to report this immediately to the nearest manager, the company's compliance officer, in accordance with the company's whistleblowing routine.

5.2. The company ensures that all reports are treated confidentially and that there will be no form of retaliation or negative consequences for persons who report in good faith.

6. Training and communication

6.1. The company will provide relevant training and information about this policy and related laws and regulations to all employees and business partners.

7. Monitoring and evaluation

7.1. The company will regularly monitor and evaluate the effectiveness of this policy and its procedures and will revise the policy as necessary to ensure continuous improvement and compliance with applicable laws and regulations.

8. Sanctions and consequences

8.1. Violation of this policy will be taken very seriously and may result in disciplinary action, termination of employment, termination of contracts with business partners, and/or legal action, depending on the severity of the violation.

8.2. The company will cooperate with relevant authorities in investigating and handling corruption cases.

9. Responsibility and implementation

9.1. The board and management of the company have overall responsibility for ensuring that this policy is implemented, followed and enforced throughout the organization.

9.2. All employees and business partners have a personal responsibility to read, understand and follow this policy and applicable laws and regulations prohibiting corruption and bribery.

9.3. Immediate supervisors have a special responsibility to monitor compliance with this policy and report any violations or suspicions of corruption to the company's compliance officer.

10. Documentation and registration

10.1. The company will ensure adequate documentation and registration of all business activities and transactions in order to demonstrate compliance with this policy and applicable laws and regulations.

10.2. All documents and records related to this policy shall be kept in accordance with the company's archiving policy and applicable legislation.

11. Review and revision

11.1 This policy shall be reviewed and revised at least every two years or upon significant changes in the company's business structure, activities or applicable laws and regulations affecting this policy.