

ANTI-CORRUPTION CODE

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REFERENCES

Almost all countries have laws prohibiting corruption of their own ~~Public Officials, laws criminalizing~~ corruption of

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Consequences of non-compliance with anti-corruption laws

As well as the personal criminal liability of the person who materially committed the offence, commission of one of the corruption offences

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STATEMENT OF POLICY

In accordance with its Code of Ethics, Nooter Eriksen forbids any form of corruption, without exception, towards any public or private subject. In particular, Nooter Eriksen forbids:

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without prejudice to gifts and entertainment expenses for third parties of limited amounts, specifically not exceeding € 150.00 per event, and in any case no higher than the overall amount of € 600.00 per year.

Nooter Eriksen prohibits all forms of corruption to any person, including, but not limited to, the types of corruption described above. Moreover, in accordance with the general standard of transparency set forth in Nooter Eriksen's Code of Ethics, any person who conducts business or negotiates with external public or private counterparties may not, alone and freely:

- x Sign agreements;
- x Access financial resources;
- x Sign consultancy agreements, professional services agreements, intermediary agreements;
- x Give benefits (gifts, benefits, etc.);
- x Hire personnel.

Compliance with Anti-Corruption Laws and this Anti-Corruption Code is mandatory for all Nooter Eriksen Employees and its Business Partners. Consequently:

- 1) All Nooter Eriksen's dealings with, or related to, or involving, a Public Official must be conducted in compliance with this Anti-Corruption Code, the Code of Ethics and the Model 231;
- 2) All Nooter Eriksen's dealings with, or related to, a private party must be conducted in compliance with this Anti-Corruption Code, the Code of Ethics's 6 (") 13 (E) - 6 (M) - 7.7 (A) - 9.6 (5) 10.7.1 (6) - 6 (1) (10) 180 (w) -

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- o The commitment of the Intermediary or the person acting on behalf of him/her to comply, at all times, with Anti-Corruption Laws and to adopt and keep in place regulatory instruments throughout the duration of the Intermediary Agreement in order to ensure its compliance;
- o The currency and amount of the compensation, which must be proportional to the subject matter of the agreement, the experience of the Intermediary and the country where the service is provided;
- o The billing terms (or methods of payment) and payment terms, taking into account that:
 - f* these payments shallitod

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Consultants

Nooter Eriksen expects all its Consultants to comply with applicable laws, including Anti-Corruption Laws. In order to prevent the possibility that - in certain circumstances - Nooter Eriksen (and/or any entities operating in its favour) may be considered responsible for corrupt activities carried out by its Consultants, these must comply with Anti-Corruption Laws and established ethical standards. Nooter Eriksen shall also check that the Consultant has an outstanding reputation for honesty, decency, professionalism and fair business practices;

- x The Consultancy Agreement must be in writing and must also contain:
 - o A declaration by the Consultant that the payment received is solely the compensation for the performances described in the agreement and th

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