

Nosres Anti-Corruption Policy

1. Introduction

Corruption is the abuse of power or position for financial or personal gain. It is a pervasive issue that affects all levels of society, from government and businesses to individuals. At Nosres, we do not tolerate corruption of all kinds when we conduct business – we are crusading against it and are promoting transparency, accountability, and trust.

We want to ensure that Nosres, its employees, and other third parties operate ethically and transparently and prevent harm to the economy and society. Therefore, the purpose of this policy is to provide guidelines for preventing, detecting, and addressing corruption within Nosres and ensure compliance with applicable anti-corruption laws.

This policy applies to all employees, officers, directors, and third parties (including agents, contractors, and third parties) of Nosres.

2. Definitions

For this policy, “corruption” includes bribery, kickbacks, embezzlement, and facilitating payments.

a. Bribery

Bribery is a form of corruption involving money, gifts, or other incentives in exchange for influence or a favorable outcome. It is a serious crime because it undermines the integrity of our company, distorts competition, and harms the economy and society.

Offering or accepting gifts, including small gifts, can be considered bribery if the intent is to influence a decision or gain an advantage in business or political dealings.

For example, if a company gives a small gift to a government official with the expectation that the official will take favorable action, such as awarding a contract, it would be considered bribery. Similarly, if an individual accepts a small gift from someone in exchange for a favor, such as changing a report or providing confidential information, it would also be considered corruption.

However, a small token of appreciation for a job well done, such as a thank-you note or a small token of appreciation, is generally considered acceptable.

b. Kickbacks

Kickbacks are a form of corruption. They refer to paying someone a portion of a contract or transaction as a secret reward for obtaining or maintaining a business. Kickbacks can take many forms, such as cash payments, gifts, or favorable treatment. They can occur in various settings, including government procurement, construction contracts, and the sale of goods or services.

c. Embezzlement

Embezzlement is a form of financial fraud. It occurs when someone who has control over money or assets takes that money or misuses those assets for their gain without the authorization of the rightful owner. It can occur in various settings, including corporations, government agencies, non-profit organizations, and other entities. Generally, it is committed by employees or trusted insiders who have access to financial accounts or resources.

d. Facilitating Payments

Facilitating payments, also known as “grease payments,” are small bribes paid to government officials or employees of state-owned enterprises to

accelerate or ease routine administrative processes, such as issuing licenses, permits, or visas; or expediting the release of goods from customs.

While facilitating payments is often seen as a way to “get things done,” they are considered illegal under anti-bribery and anti-corruption laws. They can contribute to a culture of corruption and undermine the rule of law by creating an environment in which people feel they need to bribe officials to get basic services.

3. Reporting and No Retaliation

It is strictly prohibited for any employee, officer, director, or third party of Nosres to engage in any form of corruption, either directly or indirectly. Employees, officers, directors, and third parties are encouraged to report any suspected corruption to the Ethics and Compliance or Legal department at ethics@nosres.com or legal@nosres.com, respectively. Reports can be made anonymously, and Nosres will take no retaliation against those who make good-faith reports.

4. Investigation and Cooperation with Law Enforcement

Nosres will promptly investigate any allegations of corruption and take appropriate action, which may include disciplinary action, termination of employment or contract. In addition, Nosres will fully cooperate with law enforcement agencies in any corruption investigation.

5. Disciplinary Actions

Employees, officers, directors, or third parties who violate this policy may face disciplinary action, up to and including termination of employment or contract. In addition, they may be subject to criminal or civil penalties.