

## **NBPOL Business Ethics Policy**

NBPOL believes that corruption undermines economic development and effective markets. Accordingly, NBPOL is committed to working against corruption in all its forms.

NBPOL believes that it is possible for global business to operate in a manner which grows a healthy global business based on accountability, transparency and ethics. This document sets out these business values and practices as a matter of Company policy to be followed by all directors and employees.

To anchor these commitments firmly in existing, new and future activities, we have found it pivotal to develop this policy, which will increase transparency and assist in communicating our position inside and outside the company. We also want to prepare employees to deal effectively with ethical matters.

### **To NBPOL business ethics means that:**

- we do not accept or offer bribes in any form
- we work proactively to avoid facilitation payments
- we do not contribute to money laundering. All financial transactions must be documented
- we do not pay protection money
- the value of gifts given and received must not exceed locally defined triviality limits
- we do not make financial contributions to political parties or causes
- we seek to compete fairly and ethically and within the framework of applicable competition laws; we will not prevent others from competing freely with us

### **Implementation and training**

Employees will receive training on this policy relevant to their job roles and interaction with commercial partners and government officials. The training and accompanying guidance documents will be based on realistic dilemmas related to bribery and corruption.

Furthermore, NBPOL provides mechanisms for identification of non-compliance to all employees as well as external stakeholders through our grievance procedure and whistleblowing policies which are publicly available. Employees will have access to guidance and may anonymously raise concerns about business ethics and corruption, including possible breaches of this policy.

### **Responsibility and scope**

This policy is monitored by NBPOL's Board of Directors. NBPOL's issues management committee, which reports to the Board of Directors, is tasked with reporting of business integrity-related matters, and providing guidance to employees.