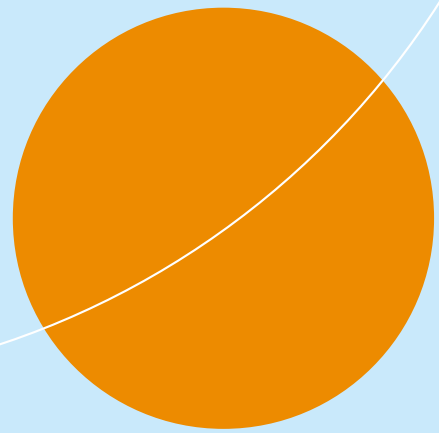


# Nets Anti- Bribery & Corruption Policy



## **Purpose**

The Nets Group (Nets) has zero tolerance towards bribery and corruption and condemns it in all its forms. It is our objective to counter and avoid bribery and corruption, both actively and passively. If employees are involved in bribery and/or corruption, they will be subjected to disciplinary actions and potentially criminal liability within the applicable laws. No abuse of power, nepotism, or bribery, including improper offers of payments to or from employees or organisations, is tolerated.

On those grounds, Nets has set forth fundamental principles to prevent bribery and corruption as well as to ensure compliance with national and international rules, standards, and principles concerning anti-corruption in connection with Nets' business operations.

## **General prohibition against bribery and corruption**

In general terms, corruption can be described as the abuse of entrusted power for private gain. Bribery is part of corruption and is characterised as the offering, promising, giving, authorising, or accepting of any undue pecuniary or other advantage to, by, or for a person to obtain or retain a business or other improper advantage.

Bribery of public officials and persons working in the private sector is illegal. A public official is a person who holds a legislative, executive, administrative, or judicial position of any kind in a country or territory, whether elected or appointed; any person who performs public functions or public services.

Facilitation payment is characterised as unofficial, improper, small payments made to a low-level official to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment is legally entitled. Nets also considers facilitation payment as bribery.

Similarly, bribery of persons working in the private sector is illegal under national laws and international conventions and will not be accepted by Nets.

## **Gifts and hospitality**

Gifts and hospitality are limited to expenditures which are reasonable, proportionate and business-related and should be limited to 100 euros. Accordingly, gifts of low value can both be offered or received in reasonable quantities. Hospitality of low value (e.g. drinks, lunch, or dinner), which is

extended as a matter of courtesy, is in principle allowed. Gifts and hospitality towards public officials must be treated with caution and limited to the modest hospitality only, while gifts should be avoided.

The acceptance of gifts and hospitality within the limitations set out in this policy shall be transparent and shall not improperly affect or influence the recipient's performance of his/her duties. Gifts and hospitality can neither be offered nor received too frequently nor at an inappropriate time in a tender phase, contract negotiation, pending legal proceeding, authorisation process, etc.

The term “gift” is understood very broadly and includes e.g. payment, gratuity, gratification, present, or advantage, pecuniary or not, offered, promised, given, or received, without any direct or indirect material or immaterial compensation, while hospitality means all forms of social amenity, entertainment, travel or lodging, or an invitation to a sporting or cultural event.

Giving or receiving money as a gift, whether in cash or through electronic means, is strictly prohibited.

In addition, it is prohibited to give economic contributions or donations to political parties.

### **Scope and application**

Nets' Anti-Bribery and Corruption Policy applies to the management, employees, and contract workers of all Nets' entities and it is mandatory to comply with this policy. Accordingly, Nets expects all its employees to act with integrity and without any actions involving corruption and/or bribery, and all of Nets' suppliers and business partners are required to comply with this policy, cf. the requirements laid forth in our Supplier Code of Conduct.

### **Commitments**

This policy is based on the following commitments:

- Nets is committed to actively and passively countering and avoiding corruption in all its forms, including bribery and extortion

- Nets complies with all relevant legislation and other applicable requirements in the countries we operate in
- Nets respects relevant international standards, conventions, and agreements
- Nets is committed to at all times having a Whistleblower mechanism in place to ensure that there is a trusted mechanism for hearing, processing, and settling internal and external bribery and corruption concerns
- Nets is committed to having frequent and adequate training of all employees – especially those that have frequent interactions with external stakeholders and customers
- Nets is committed to investing in security measures to counter and avoid all kinds of corruption and bribery throughout society
- Nets is committed to having relevant controls in place to ensure adherence with this policy.

## Objectives

Objective	Relevant KPIs	2019-2025
Communication and training about anti-corruption policies and procedures	Total number and percentage of employees that have received training on anti-corruption	All employees receive adequate yearly training and a response rate above 75%

To raise awareness of anti-corruption policies and procedures and to secure the proper capabilities among employees, Nets is committed to ensuring that all employees receive appropriate training.

## Governance

Responsibility for approval of this policy lies with the Board of Directors. It is the responsibility of the CSR Steering Committee to ensure implementation of the policy.

Regulatory & Compliance owns, endorses, and ensures implementation of the policy. Group Public Affairs & CSR advises policy owner on policy content and ensures relevant and accurate communication towards external stakeholders.

Management at all levels is responsible for ensuring adequate understanding of the policy and leading by example within their respective departments. All employees and contract workers are responsible for observing this policy and reporting any discrepancies to the policy owner or via the whistleblower scheme.

### **Reporting**

Nets reports on the Anti-Bribery and Corruption Policy annually and in accordance with applicable law and regulations. The policy is part of our Corporate Social Responsibility (CSR) set in the management review in our Annual Report and our Communication on Progress to the United Nations Global Compact. KPIs, objectives, and targets shall be evaluated yearly, and new shall be established when relevant and in alignment with other Nets targets and strategies.

### **International commitments**

Nets is a Signatory to UN Global Compact and is continuously working to incorporate its Ten Principles into our business strategies and daily operations.

### **Policy Revision**

This policy will be reviewed every year and, if necessary, revised. The policy may be amended at any time with the approval of the Board of Directors. Responsibility for the policy revision lies with the policy owner.

### **Contact**

For more information, please contact Group Public Affairs & CSR in Nets.