

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

*This policy is developed by the Varner CSR team and is regularly revised by both Varner and expert organizations.*

The objective of Varner is to combine sound business practices with responsible and ethical behaviour. One of our core corporate values is **responsibility**. We promote ethical conduct in all business operations. We expect our suppliers and business partners to do the same. Both Varner employees and our business partners must comply with our expectations and applicable laws on anti-bribery and corruption listed below.

An important key to our business is building strong and long-term relationships with our suppliers and business partners founded on mutual respect and dialog. We expect all business partners to be self-reliant and accountable. Transparency and openness throughout the entire value chain is always important.

### ZERO TOLERANCE

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Varner has a Zero Tolerance Policy on corruption and bribery. Irregularities will not be tolerated and will be closely monitored.

By corruption, we mean any misuse of power, office, sensitive information or resources to gain personal advantages connected to our shared business. By bribery, we mean offering something of value in order to persuade the receiving party to act in a certain way that benefits the offering party.

Corruption and bribery in any form is unacceptable, including extortion, kickbacks and improper private or professional benefits, gifts, loans, fees or reward to customers, agents, contractors, laboratories, suppliers in all tiers, Varner Production Offices, or employees of any such party or government officials. This does not apply to gifts of a modest value (*refer to local laws on taxation*).

Varner employees are not to accept personal benefits and gifts that may influence or be meant to influence any decision in a matter of supply, negotiation or any business operation.

We require all business partners to kindly respect this policy. Internal policies for anti-bribery and corruption should be established and implemented by all our business partners to show transparency and openness.

Varner reserves the right to take disciplinary action if we discover a breach of this policy in any of our business operations. We perform social audits of all suppliers and sub-contractors to make sure this policy is not violated.

In the event of any act of corruption or bribery, or the attempt of such activities, please contact [concern@varner.com](mailto:concern@varner.com). The information will be handled professionally with confidentiality.