

# Anti-corruption and Anti-bribery Policy

(Fair Competition Policy)

(hereinafter “the Policy”)

for

RewAir Holding A/S and controlled subsidiaries.

(hereinafter “RewAir”, “We” or “we”)

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CONTENTS

1. INTRODUCTION & OBJECTIVE: ..... 2

2. SCOPE & APPLICABILITY: ..... 2

3. DEFINITIONS: ..... 3

4. GENERAL POSITION ..... 3

5. IMPLEMENTATION & COMPLIANCE: ..... 4

6. ANNEX 1: Red Flags ..... 5

1. INTRODUCTION & OBJECTIVE:

RewAir is committed to conducting all business operations with honesty and integrity, adhering to a zero-tolerance policy on bribery and corruption.

The main objective of this Anti-corruption and Anti-bribery Policy is to offer clarity on definitions and behavioral expectations supplementing the RewAir Employee Code of Conduct and emphasizing fair and ethical practices in all business dealings and relationships.

2. SCOPE & APPLICABILITY:

This Policy is valid for RewAir Holding A/S and its controlled subsidiaries.

This Policy applies universally to all Employees (as defined in the Employee Code of Conduct), including directors, officers, agency workers, seconded workers, volunteers, and interns, regardless of location.

This Policy is to be read in conjunction with the Employee Code of Conduct.

The latest version of this Policy is available on [www.rewair.com](http://www.rewair.com).

**Legislative Consistency:**

The Policy applies consistently, irrespective of local leniency in laws.

Harmonized legislations and extraterritorial effects of certain laws mean that RewAir may be held accountable for bribery acts by those acting on its behalf, regardless of location.

**Consequences of Corruption including Bribery:**

Corruption, including bribery poses threats to social justice, hampers investment, and impedes economic growth. Companies failing to prevent corruption, including bribery face fines, exclusion from public contract tenders, and reputational damage. Individuals found guilty may face imprisonment and fines.

Engaging in bribery and corruption is both a criminal offense and a breach of the ethical standards of RewAir.



### 3. DEFINITIONS:

**Corruption:**

Corruption is misuse of entrusted power for private gain. Corruption may involve bribery.

**Bribery:**

Bribery is offering, promising, giving, soliciting, receiving or accepting any advantages (tangible or intangible) to induce improper actions of an individual holding a public or legal duty. Acts are deemed improper if they are illegal, unethical, or contrary to expectations of good faith or impartiality, and if they abuse a position of power.

**Conflict of interest:**

A situation where an individual is confronted with choosing between the requirements of his/her official function and his/her own private interests.

A conflict of interest arises when what is in a person's best interest is not in the best interest of another person or organization to which that individual owes loyalty.

### 4. GENERAL POSITION

**Bribery and Corruption:**

RewAir strictly prohibits both active and passive corruption including bribery, regardless of whether it involves officials or private individuals. Employees are prohibited from offering or accepting anything of value to influence professional objectivity.

Employees shall never offer, promise or give anything of value to influence someone's professional objectivity for his or her benefit or the benefit of self and/or RewAir.

**Gifts and Hospitality:**

While recognizing cultural nuances, RewAir allows modest, reasonable, and infrequent gifts and hospitality, if they don't influence business decisions. Transparency, reciprocity, and adherence to local laws are emphasized.

The giving and accepting of gifts are allowed if the following requirements are met:

- a) it is not done with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits;
- b) it is given in the name of the company, not on behalf of an individual;
- c) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- d) it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value;
- e) it is given openly, not secretly; and
- f) it complies with any applicable local law.

Any other gifts, invitations and alike must be politely refused or returned.

**Facilitation Payments:**

RewAir unequivocally rejects facilitation payments, allowing exceptions only when necessary to protect health or safety.

**Use of Intermediaries and Lobbyists:**

Third-party engagements require legitimate need, risk-based due diligence, written contracts, compliance with Supplier Code of Conduct, and transparent reporting.

**Political Contributions, Social Investments, and Sponsorship:**

Contributions are prohibited if aimed at improperly influencing political decisions. Social investments and sponsorships must align with local laws, have relevance to the community, and enhance RewAir's reputation as a responsible corporate citizen.

**Suppliers/Business Partners:**

RewAir require strict compliance with laws and our RewAir Employee and Supplier Code of Conduct, following thorough due diligence processes.

**Money Laundering:**

RewAir prohibits involvement in money laundering, ensuring business relationships only with reputable entities.

**Conflict of Interest:**

RewAir prohibits activities and decisions involving conflict of interests unless previous authorization has been received by Sire or Group Management at RewAir.

## 5. IMPLEMENTATION & COMPLIANCE:

Employees are responsible for preventing, detecting, and reporting corruption including bribery. Training, internal audits, and a reporting mechanism are in place to reinforce the Policy.

In case of suspect of non-compliance with this policy, all employees must communicate this situation using the established channels in the company.

**Sanctions:**

Disciplinary action, including dismissal of misconduct, awaits Employees violating anti-bribery policies.

**If in doubt:**

Good judgement is key always to ask yourself: how would this look to others within RewAir and externally? Could this be considered as having a wrongful purpose? If this embarrasses either RewAir or the recipient, do not proceed.

In in doubt, Employees must reach out to his/her manager, alternatively to the QHSE Manager, Site or Group Management, or to the HR Manager.

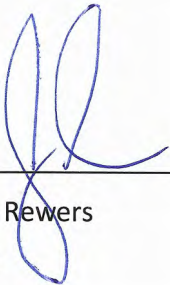
Reference is made to Annex 1: Red Flags.



## 6. ANNEX 1: Red Flags

The following list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for the Gurit Group, you must report them promptly in accordance with our internal procedure for reporting a concern.

- You learn that a third party working for RewAir has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials,
- ☐ A third-party request is that payment is made to a country or geographic location different from where the third party resides or conducts business,
- A third party requests an unexpected additional fee or commission to "facilitate" a service,
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services,
- A customer requests that you provide employment or some other advantage to a friend or relative,
- Unexplained preferences for certain subcontractors,
- A third-party insists on the use of side letters or refuses to put terms agreed in writing,
- You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided,
- You are offered an unusually generous gift or offered lavish hospitality by a supplier

  
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