



ANTI-CORRUPTION POLICY

TruVant has a **zero-tolerance** approach to corruption issues. Our objective is to ensure a fair and transparent business model to guarantee trust, security, free competition, and value for all stakeholders.

This objective is achieved through:

- shaping awareness in identifying corrupt behaviour
- setting rules and standards of conduct aimed at preventing and responding to actions that display signs of corruption
- ensuring training for employees and third parties to prevent or eliminate any fraud, corruption, and conflicts of interests

TruVant's Anti-Corruption Policy (the "**Anti-Corruption Policy**") should be interpreted and applied in accordance with TruVant's Code of Ethics. This Anti-Corruption Policy establishes TruVant's commitment to ethical business practices such as UNCAC (The United Nations Convention against Corruption) and compliance with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("**FCPA**"), the UK Bribery Act, and other applicable anti-bribery laws globally. Failure to comply with these laws may result in civil and/or criminal fines, as well as significant reputational harm.

This Anti-Corruption Policy aims to prevent or eliminate bribery and corruption in all TruVant activities, including with third parties, and to ensure integrity in operations across the U.S., Poland, and other countries where TruVant conducts business. This Anti-Corruption Policy applies to all TruVant officers, directors, managers, supervisors and employees (collectively, "**Personnel**"), and agents, contractors, consultants, and any other third parties acting for or on behalf of TruVant (collectively, "**Third Parties**") worldwide.

Sincerely,

Stewart Atkinson

CEO and Chairman of the Board



Responsibilities

Personnel

Must read, understand, and comply with this Anti-Corruption Policy and report any suspected violations. All Personnel will receive mandatory anti-corruption training upon joining Truvant and periodically thereafter. Additionally, all employees will attest receipt of training and understanding of policy after each training session.

Managers and Supervisors

Ensure team members understand and adhere to this Anti-Corruption Policy.

Chief Financial Officer

Oversee the implementation and adherence of this Anti-Corruption Policy. Ensure the responsible teams complete timely risk assessments, monitor compliance and investigate allegations of misconduct.

ESG Team

Define and deliver corruption training and maintain training records; communicate completion rate; perform periodic risk assessment with cross-functional team.

Defining corruption

Any corruption hinders economic development, violates free competition, increases business costs, and reduces security and quality of products and services, which may threaten interests and destroy the image of any entity involved in economic trading.

Corruption means promising, proposing, giving, demanding, or accepting by any person, directly or indirectly, any undue financial or non-financial benefit, whether tangible or intangible, personal or otherwise, for themselves or any other person, or accepting proposals for or promises of such benefits in exchange for an act or omission that would or does provide any improper advantage. Corruption also means making indirect offers, promises, or payments through a third party knowing they will be, or are intended to be, used for a corrupt purpose. Knowledge includes conscious disregard and deliberate ignorance of facts that indicate a high probability that the relevant activity will occur.

Certain laws, such as the FCPA, limit a bribery offense to a payment made to a foreign government official. Other laws, such as the UK Bribery Act, also make a corrupt payment to a private person illegal. It is Truvant's policy to prohibit all corrupt payments or any other corrupt provision of anything of value, direct or indirect, to any person, whether a government official or a private citizen.



Red flags that could indicate corruption-related behaviours include:

- The reputation of the country in question: Certain countries are known to encourage or tolerate corruption. Organizations such as Transparency International (<https://www.transparency.org/en/cpi/2024>) publish rankings or scores that gauge the prevalence of corrupt activity.
- The reputation of the entity or individual: Public or online searches, or more in-depth reports provided by business intelligence vendors, can provide a profile of an entity's or an individual's corruption reputation.
- The amount of the commission paid to the individual or entity as compared to a typical or market rate: Excessive commissions may indicate that the recipient of the commission is making or intends to make illegal payments. Payments to individuals or entities should always be strictly for services rendered, and they should be reasonable in amount taking into account the nature of the services and their prevailing market price.
- Requests for special benefits: A request for gifts, perks, or special treatment, such as luxury dinners or tickets to a professional sporting event or a nepotistic preference in an employment or internship context, could indicate that the person requesting these considers them as a *quid pro quo* to take corrupt action.
- Refusal to provide certain anti-corruption representations: For example, if Truvant requests a Third Party to represent that the Third Party will not provide money for a corrupt purpose, and the Third Party refuses to make the representation, there may be a potential problem.
- The relationship of the Third Party to the government: If the Third Party has a relationship with any government official or with a company in which a government official has an interest, or was recommended by them, the risk of illegal payments to a government official is increased.
- Payments to third persons or payments made in a third country: If a Third Party requests that his or her commission be deposited in a Swiss bank account, this could evidence a plan to divide the commission with another person for a corrupt purpose. Undisclosed principals, associates, or subcontractors with whom fees or commissions are split also present a red flag.
- Large or unusual political or charitable contributions: These could indicate a desire to obtain improper influence through making these contributions.
- Unusual bonuses or other extra amounts paid to foreign operational managers: These types of monetary incentives should be well documented because they could indicate an intention to make a corrupt payment.
- Unusual methods of payment, including cash, checks made out to "cash", or payments routed through one or more third parties. These could indicate an intent to conceal a corrupt payment.



Prohibition of corruption and conflict of interest situations

Truvant prohibits its Personnel and Third Parties from undertaking any corrupt activities, in particular activities that meet, or could be perceived to meet, the criteria of corruption as defined by this Anti-Corruption Policy in so far as they relate, directly or indirectly, to Truvant's business or operations.

Personnel and Third Parties should avoid situations in which their activities would lead, could lead, or could be perceived to lead to a conflict of interest with Truvant.

For the purposes of this Anti-Corruption Policy, a conflict of interest is any situation in which the impartiality or independence of persons acting for or on behalf of Truvant, including any Personnel or Third Parties, may be compromised because of personal, property, or financial considerations. A conflict of interest arises when Personnel or Third Parties place personal interests above the interests of Truvant.

General principles of accepting and giving gifts in business relations

Personnel (and their immediate family members) are forbidden in their personal capacity from soliciting or accepting gifts, services that typically cost money, loans, payments, or other favours from customers or Third Parties. Non-cash gifts may be accepted only if they are negligible in value, or are advertising and promotional materials clearly marked with the name of the company or brand and their value does not exceed 200 PLN (two hundred Polish Zloty) or \$50 (fifty US Dollars).

Personnel are permitted to provide gifts to Third Parties only for legitimate business purposes, such as working meals or promotional items with a Truvant logo, as long as their value does not exceed 200 PLN (two hundred Polish Zloty) or \$50 (fifty US Dollars).

If there are any doubts as to the value of a non-financial gift to be accepted or given, it should be reported, as indicated in paragraph named **Reporting Irregularities** of this Anti-Corruption Policy or submitted in advance to HR for approval in accordance with this Anti-Corruption Policy.

Gifts to public officials, government or local administration representatives are strictly forbidden regardless of the value.

Ethical sourcing of goods and services

Truvant chooses its suppliers based on the principles of transparency, professionalism, traceability, and equal treatment. Truvant uses objective criteria such as diversification of its supplier base, relative competitiveness, quality, and budget. This Anti-Corruption policy requires all Personnel and Third Parties to adhere to these principles.



Books, records, and internal controls

All financial transactions must be accurately recorded in Truvant's accounting systems and supported by appropriate documentation to prevent concealment of corruption. All Personnel must comply with Truvant's internal controls and relevant procedures.

Duty to cooperate

Truvant may at times undertake a more detailed review of certain transactions. As part of these reviews, Truvant requires all employees, agents, and third-party representatives to cooperate with personnel, outside legal counsel, outside auditors, or other similar parties conducting the work. Truvant views failure to cooperate in an internal review as a breach of obligations and will deal with this failure severely in accordance with any local laws or regulations.

Donations and sponsorship

Truvant and its Personnel can provide financial support on behalf of Truvant, in the form of sponsorship or donations to foundations, associations, organizations, and institutions that support social, health, educational, amateur athletic and environmental protection initiatives. All these financial activities should be approved in advance by HR or Finance under the supervision of the CFO. Truvant prohibits any Personnel from making financial or non-financial contributions or gifts to political parties or politicians.

Reporting irregularities

Any suspected violations of this Anti-Corruption Policy, other provisions of law, or other ethical principles must be reported through: etyka.truvant.com.pl in Europe or ethics.truvant.com in North America. Notifications concerning breaches and potential breaches of this Anti-Corruption Policy shall be initially reviewed, under the supervision of the CFO, by HR and will include any other stakeholders relevant to the issue. All such reports shall be entirely confidential except to the extent necessary to verify or obtain relevant factual information. All Personnel who make a report consistent with this Anti-Corruption Policy shall not experience any retaliation for making such a report in good faith.

Disciplinary measures

Violations of this policy may result in disciplinary action, including termination of employment, and may also lead to civil or criminal penalties under applicable laws. Any case of non-compliance with the rules specified in this Anti-Corruption Policy will be considered individually.



Review and updates

This policy will be reviewed annually or when there are changes in applicable laws, regulations, or business operations.

Any changes to this policy will be communicated to all Personnel through internal communication channels and published on Truvant's website.

For questions regarding this policy, please contact Mary Barnett, Chief Financial Officer.