

Procedure		Doc no	P018
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Nor-Maali Oy's Anti-Bribery / Global Gift Policy			
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Policy owner:	Managing Director	Approved by:	Board of Directors

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A Finnish translation of this Anti-Bribery and Gift Policy is also available. The Finnish Translation is including additional information, practical examples and e.g. gift values. In case of differences in information: the order of priority is this English version.

1. Definitions and Principles

This **Anti-Bribery & Gift Policy** applies to every staff member of Nor-Maali Oy, as well as third parties acting on behalf of Nor-Maali Oy. Nor-Maali Oy means here either company or its staff.

Nor-Maali Oy shall not accept or give inappropriate gifts. Therefore, this Policy addresses how to provide any gift to a Public Official, commercial client, business partner or other parties and whether to accept gifts.

For Nor-Maali Oy staff violations of this Policy may lead to disciplinary action, up to and including termination of employment.

Staff with knowledge or suspicion of violations of this Policy must report his/her concerns to managing director or email address hallinto@nor-maali.fi or via anonym whistle blowing channel: address https://nor-maali.ilmoituskanava.fi (provided by chamber of commerce).

This Policy reinforces our commitment to adhering to the highest ethical standards of conduct in all of our business activities by acting in a manner that enhances Nor-Maali Oy's reputation, as set forth in the Code of Conduct.

“Gift” means any bestowal of money, any item of value, service, loan, thing or promise, discount or rebate for which something of equal or greater value is not exchanged. For the sake of clarity if any supplier, customer or consultant or any professional travel along with Nor-Maali's staff for business purpose and Nor-Maali staff has to pay for their travel, stay, food etc. this will not be termed as a gift.

Gift does not include:

1. Any discount or rebate made in the regular course of business and offered to the general public without regard to the individual's connection with Nor-Maali Oy;
- 2) Plaques or trophies;
- 3) Campaign contributions.

To avoid that the gifts we provide to the entities mentioned above (including any members of their families) appear as improper and to preserve the integrity of our Company, Nor-Maali Oy has identified some criteria that entire staff should always keep in mind.

Any Gifts must be:

- For a proper purpose, and not intended to secure an improper advantage or otherwise inappropriately influence the recipient;
- Permitted by the law;
- Permitted by Nor-Maali Oy's Policies and Code of Conduct; i.e. e.g. maximum value for dinner is 150 EUR / participant.
- Permitted by the recipient's policies;
- Reasonable in value and appropriate under the circumstances.

2. General Standards

Nor-Maali Oy intends to be associated only with gifts or entertainment involving third parties if:

- for legitimate business purposes;
- not given to create, or give the appearance of, an implied obligation that the person offering is entitled to preferential treatment;
- reasonable and appropriate;
- not offered as a bribe, payoff or kickback

Nor-Maali Oy's staff may pay for occasional meals and refreshments, as well as reasonable travel and accommodation, naturally in relation to business purposes only.

There are a number of factors to consider when applying the mentioned criteria to a proposed gift that you may want to provide or receive:

- there is a current or potential sales pitch or active opportunity with the recipient's company;
- the gift has a potential to create a reputational concern or a negative impression for Nor-Maali Oy.

In the above situation, you must consult with Managing Director to determinate whether a proposed gift is appropriate.

3. Gifts to Public Officials

Offering gifts or indeed giving the impression of doing a favor for a Public Official is prohibited unless prior written approval from the managing director. In general no gifts to public officials at all, in trainings or meetings Nor-Maali branded office supplies are acceptable. Refreshments should limit to value e.g. coffee and small sandwich.

4. Gifts to Other Third Parties

Providing a Gift to individuals who are not Public Officials, such as commercial clients, business partners and suppliers, might be permissible if the Gift meets the above principles and rules.

Furthermore, unless otherwise expressly permitted Gifts may only be offered to individuals with whom Nor-Maali Oy has a business relationship, excluding spouses, family members, or friends of such individuals.

Cash or cash equivalent (such as gift cards or gift certificates) must never be offered or accepted.

The giving of alcohol as a business gift must always be considered carefully. You must ask potential recipients whether any rules or restrictions apply to them and ensure that any more restrictive limits are followed.

5. Accepting Gifts as a Nor-Maali Oy's Staff Member

If you receive gifts from business partners, they should always be modest and reasonable, never lavish and must not give the impression that the gift is intended to influence. If it may be considered generous by an outsider, you should politely refuse or seek guidance. Under certain circumstances, when rejecting an inappropriate gift is not possible, the guidance of your closest Manager should be sought.

6. Valuation of gifts

Nor-Maali Oy's staff should determine the value of gifts exercise good judgment. The value must also be deemed to be the full market value, not a value discounted for bulk purchases or special offers.

7. Other

For the sake clarity we apply in our business either VTY (Finnish Paint Association) sales conditions or Nor-Maali's General Conditions of Sale (in English).

Loyalty cards such as S-card, K-card, airline loyalty cards: You may not use them to gain personal benefits. The benefits, e.g. bonus points redeemed for personal and private use constitutes taxable income. Bonus points can be used for business purposes. (Income tax act/ Tuloverolaki 29§).

Nor-Maali Oy requires all employees and partners to adhere to these principles to ensure ethical and lawful operations.