

Gift & Hospitality Policy

1 BACKGROUND AND OBJECTIVES

This policy applies to all employees at RiskPoint Group (the “Company”) on a global basis. Business gifts and entertainment are common courtesies in many business circles and differ by culture globally. They can, however, be inappropriate if they are too lavish, frequent, of a sexually suggestive nature, or if the courtesies are used to improperly influence a business decision. In worst case scenarios, they can be seen as bribery.

We all have an obligation to use Company assets appropriately which also includes our behaviour in the course of travel and entertainment.

2 EMPLOYEE BENEFITS

Employees at the Company may only receive benefits that are administered centrally as a component of the total benefits package. The exceptions to this are specified below.

The Company reports taxable employee benefits according to the applicable legislation at any given time.

3 GIFTS TO EMPLOYEES FOR SPECIAL OCCASIONS

Gifts for special occasions such as gifts/flowers in connection with weddings, birthdays, illness and more are allowed.

4 FEES

Receiving fees for participating as a speaker for brokers, clients, suppliers, and other external relationships is not allowed when representing the Company, unless pre-approved by the CEO. However, receiving symbolic gifts such as wine or chocolate is allowed.

5 GENERAL RELATIONSHIPS BETWEEN RISKPOINT GROUP AND BUSINESS RELATIONSHIPS

Employee relationships with brokers, clients, suppliers, and others must be based exclusively on a healthy and honest business conduct. Offering and receiving gifts, inviting business relationships out to eat, or being invited yourself can enhance cooperation with third parties. However, it can lead to conflict of interests and therefore need to be managed with care.

Efforts should be made to ensure a reasonable balance for visits to business relationships and for inviting business relationships to visit the Company.

6 MEALS WITH BUSINESS RELATIONSHIPS

The Company will pay for the reasonable costs of meals with business relationships. As a guidance the amount for a meal including beverages should not exceed the following amounts¹ per person:

- EUR 150 for lunch
- EUR 200 for dinner
- EUR 300 for all day meeting

¹ Or equivalent in local currency

The employee shall always take due consideration to general price level and culture of the country in question. If the value of the meal is perceived to exceed the above-mentioned amounts, it should be, to the extent possible, pre-approved by the employee's Manager.

7 GIFTS TO AND FROM BUSINESS RELATIONSHIPS

As a guidance the maximum amount for gifts to business relationships is EUR 100. In case of special occasions, such as anniversaries and round-number birthdays, the amount should not exceed EUR 150. Any gifts exceeding the above-mentioned amounts should be approved by the Country Manager.

Employees must not offer or accept gifts or entertainment or anything else of a value, if it is:

- Illegal
- In conflict with the rules that apply in the recipient's organisation
- Cash or cash equivalents
- Morally offensive, of a sexual nature or in another way violates the Company's values
- Given as quid pro quo

8 VIOLATION OF THE GUIDELINE

Violation of this policy can have consequences for the employee's employment relationship.

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