

# Anti-Bribery and Corruption Policy

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## Purpose

This policy outlines acceptable and non-acceptable behavior to ensure compliance with as many international anti-corruption and anti-bribery laws as possible. This includes compliance with all laws, domestic and foreign, prohibiting improper payments, gifts, or inducements of any kind to and received from any person, including officials in the private or public sector, customers, and suppliers.

## Definitions

**Bribe:** Dishonestly persuade (someone) to act in one's favor by a gift of money or other inducement.

**Corruption:** The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

**Kickbacks:** The return of a sum already paid or due as a reward for awarding or furthering business.

## Scope

This policy is applicable to all employees of Star Information Systems (STAR). All suppliers and contractors are also made to comply with this policy. This Policy is intended to supplement all applicable laws, rules, and other corporate policies.

## Compliance

STAR recognizes that the exchange of business courtesies in form of gifts, meals and entertainment is a common practice to establish good business relationships as well as recognition of service well done. Such practices are allowed, provided that the value of the gift, meal or entertainment does not violate any laws of the given country and is not intended to improperly influence the decisions of the person involved.

STAR employees are strictly prohibited from offering, paying, promising, or authorizing any gifts, kickbacks and payments from/to any person acting on behalf of an organization, government bodies or personal interest in exchange of:

Causing a person to abuse their position,

Influencing important decision on contracts and/or

Inducing a person to violate laws.

Employees are strictly prohibited from soliciting any gifts, kickbacks, and payments as an inducement to perform an operation, service, or function on behalf of STAR.

STAR employees are also allowed to walk away from any situation where they are approached to giving bribes – no matter the consequence for the company.

When in doubt always ask your superior or higher ranked.

## Whistleblowing Policy

Should you suspect any of the employees of violating this policy, you are to report to your supervising officer immediately. Should the person you are suspecting is your supervising officer, you are to report it to the Managing Director.

All reports will be treated with strict confidentiality and no employees will suffer any consequences of reporting suspected violations.

STAR will treat all reporting of violations seriously and investigate all suspected wrongdoings without prejudice and with equal measures.

## Violation

STAR will take serious action on any employees that are found violating this policy.

Should any employee violate this policy, he/she will be subjected to disciplinary actions that could result to instant dismissal and subject to criminal liability should any laws had been broken.



**Peter Pronstad, Chairman**



**Per Anders Koien, CEO**