

Code of Conducts



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vers. 1.0

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Eagle Technology enjoys a good reputation with their employees, suppliers, contractors, clients and other stakeholders connected to us. Our reputation has been built over the years with great care, and it is a most valuable and precious possession. We want to maintain, and where possible, develop and build on our good reputation. Together we have been able to establish a strong market position worldwide. We invest greatly in the development of our products and our employees, as well as the service we offer our clients, and in our international network.

The skills and talents of our employees and the strong mutually shared values are at the basis of our success.

By means of this code of conduct we aim to provide a clear picture of the type of company that we strive to be, and of the people that match our views and objectives. When making decisions, it is of the utmost importance that we take into account the company's interests as well as the effect it will have on the general public and the world we live in.

The board of directors strongly support initiative of UN Global Compact and its four principles (human rights, labour, environment and anti-corruption).

INTRODUCTION

The Code of Conduct states the basic principles and the professional standards and ethics of Eagle Technology. This Code of Conduct allows us to share our strong corporate culture in a structured manner, and it provides guidelines for our activities and our behaviour.

The Code of Conduct is therefore:

- The document that provides the foundation Eagle Technology's business ethics, to which all recipients agree upon when entering into a business relationship with the company.
- A fundamental and important means towards the ethical and sustainable growth of the company.

The ethical Code of Conduct is meant for those who work in name of, or under the authority of Eagle Technology, like:

- Directors
- Supervisors
- Managers
- Staff
- Temporary worker / flex workers
- External contractors (advisors, agents and representatives)

Every recipient is obliged to comply with the basic principles and rules stated in this Code of Conduct, the regulations as defined by the legal order (national, supranational, international) where one works, and according to the conditions of the collective agreement.

Managers and supervisors should set a good example, and show that respecting the Code of Conduct is a fundamental part of our daily activities, and that complying with the basic principles of the Code is closely connected to the success of our business. It is Eagle Technology's aim to inform their existing and new business connections on the existence of the Code of Conduct through their authorized departments.

1. THE RELATIONSHIP BETWEEN EAGELE TECHNOLOGY AND SOCIETY

Every company has an impact on mankind/humankind and the environment. We realize that this comes with a great social responsibility. Sustainability, safety and respect for people, society and the environment are of great concern and importance to us.

1.1 Corporate Social Responsibility (CSR)

The choices we make today have an effect on and are important for future generations. That is the simple underlying thought behind Corporate Social Responsibility. It is also imperative that we find a good balance between the large number of other interests Eagle Technology affects. Because Eagle Technology feels responsible for the way the company's activities affect humanity, environment, and operational management, they put in the effort to make conscious choices to ensure that their decisions and actions meet the expectations of society as much as possible.

1.2 Running a business abroad

Eagle Technology is a multinational. We respect local values and conventions and we guarantee that our staff policy does justice, world-wide, to our responsibility as a good employer.

Eagle Technology respects the nature, culture, and customs of her host countries.

1.3 Safety

The most important principle is that our activities may never put the safety and/or well-being of our employees, clients or environment at risk.

Despite all the safety measures that have been taken, carrying out of the work activities is not without any risk. That is why employees must carry out their activities in accordance with the set guidelines and procedures, to ensure their own safety and the safety of their colleagues and their environment. Employees will receive extensive advice and training on the subject.

1.4 Innovation

Eagle Technology wants to set itself apart from other companies in the field with their innovative solutions. We would like to put this innovative entrepreneurship forward. The development and gaining of knowledge in the technical field is of vital importance to innovation. Eagle Technology is therefore looking to establish an intensive cooperation with various research departments and universities.

2. THE RELATIONSHIP BETWEEN THE COMPANY AND ITS EMPLOYEES

Eagle Technology strives to offer her employees a stimulating and healthy working environment.

2.1 An honest employer

People are at the heart of our company and are our most valuable asset, since they are the true moving force behind the development and growth of our company.

By offering training, courses and professional development we aim to help every employee in developing their individual talents and skills and in reaching their full potential in favour of/ to benefit themselves and the company. We subsequently attach great importance to the recognition and acknowledgement of accomplishments and professional skills of our employees.

In addition, we strive for everyone working for our organization to get as much satisfaction and pleasure out of their work as possible.

2.2 Equal opportunities

Eagle Technology is inspired by the basic principles of personal freedom, dignity and respect in creating and sustaining a positive working environment in which all our employees get the opportunity to carry out their work in optimum circumstances and to achieve their professional goals.

We make sure, besides respecting fundamental individual rights, that the basic principles regarding equal opportunities are respected by creating a working environment where there is no room/tolerance for discrimination on the basis of race, culture, ideology, gender, age, physical health, religion, etc.

We consequently condemn all forms of discrimination and intimidation (including sexual intimidation) like:

- The creating of either an intimidating or hostile working environment, or a working environment which is in one way or the other isolating or discriminating;
- An unjustifiable interference in another's affairs or work;
- Requesting personal favours in exchange for opportunities of professional growth.

2.3 Laying down company rules

Even though Eagle Technology does not aspire to be focussed on nothing else than rules and regulations, employees should expect us to have clearly laid down the ground rules and regulations concerning employee - employer relationship in the employee handbook and supplementary guidelines/protocols.

For more information and potential changes to the document see the intranet.

2.4 Safety and health

Eagle Technology will ensure a safe and healthy working environment, and will execute its activities while taking the safety of its employees, external parties and the community in which she is operating into account.

Your health is of vital importance, but it simultaneously represents economic value. With our active company health policy we hope to have a positive influence on the health and well-being of our employees.

2.5 Alcohol and drug (ab)use

The use and abuse of alcohol and/or drugs is considered to be a serious threat to the health and well-being of our employees. Eagle Technology has an active prevention policy for alcohol and drug abuse and aims to ban all alcohol and drug use from the work floor.

2.6 International business travel

Some employees may go on international business travel. The conditions attached to international business travel are that transport and accommodation are safe and functional. Eagle Technology has set oneself the objective of informing the employee at the onset to the best of its abilities on the destination.

One can contact the contracted organization in case of illness/emergencies or a crisis situation (for more information see: brochure 'international travel'). This organization offers a 24-hours service for assistance. The internal contact point for emergencies during international travel is the HR department. (HR Manager)

2.7 Works council

Eagle Technology recognizes the works council in being as a body that has a representative, advisory and influential function within the company. It respects the given rights of the council to give consultation, approval or advice in the decision making process on policies and other affairs that are connected to employee rights or interests.

Eagle Technology expects the works council to take a positive stance, in which one never loses sight of the company's interests.

2.8 Development of employees

Eagle Technology offers her employees clear and structured career planning. We offer our employees the full scope to develop his or her talents by offering various educational options from long to short-term courses. Supervisors will encourage their staff to educate and develop themselves and will guide and support them in their professional and career development.

2.9 Privacy

Eagle Technology respects the privacy of her employees. We believe it is of the utmost importance to handle personal details with great care. Personal data of our employees is filed, altered or saved. This process is always in accordance with the Personal Data Protection Act.

In a few particular cases we may deviate from the norm.

That is in the case of:

- Monitoring business e-mail, internet, and phone usage;
- Monitoring by way of security camera's;
- The registration and reading out of the use of company cars;
- The suspicion of a serious violation of the company rules.

3. THE RELATIONSHIP BETWEEN THE EMPLOYEES AND OUR COMPANY

Eagle Technology works towards having committed employees, who are proud of our brand and act in the interest of our company. This chapter describes how one should interpret and what is expected from the relationship between the employee and Eagle Technology.

3.1 Honest employees

Eagle Technology expects her employees to have an honest and professional attitude towards and at work. This can be seen in the level of sincerity with which one maintains their relationships with colleagues, clients, business connections and with the rest of society.

Employees are obliged during working hours to act according to national and international legislation and regulations in force. In addition, one must also follow internal rules, amongst which this Code of Conduct, the underlying guidelines and the common values, which are often not written down but are equally important.

3.2 Teamwork

Enjoying your time at work is important. Together we are responsible for creating a good and comfortable working environment and for the way we interact with one another.

Teamwork is key in our pursuit of success. Individualists do not quite fit in with our company, since it is not your own interests, but it's the combined effort that counts. Which means taking responsibility for your contribution to the team effort.

Concrete:

- Being there when people count on you;
- A positive attitude towards colleagues;
- Aiming towards a maximum contribution to the team effort;
- Live up to your promises;
- Being honest about mistakes that were made and aim for improvement;
- Discussing any problems with the company or colleague with the person in question, not with others.

3.3 Business information

All information related to the company is considered confidential and should not be disclosed to external parties. Business information is exclusively shared between co-workers, and only when this is necessary in/for the execution of the work. Sensitive business information may only be shared when a supervisor has given his explicit consent and when this is for the benefit of the operational management.

3.4 Safety awareness

The employees themselves are responsible, in addition to the safety precautions taken by Eagle Technology, for creating a safe working environment. Employees work according to the safety rules and regulations, following either the internal and/or the safety rules that are in force on site, and will make use of the personal safety precautions or personal protective equipment.

Employees are familiar with and will follow the safety procedures. Dangerous situations must be immediately reported to the security officer.

3.5 Sidelines and/or additional functions

Eagle Technology appreciates it when their employees are actively involved in society. However, the accepting or execution of any sideline or additional function may never interfere or conflicts with Eagle Technology's interests, nor have the appearance of conflicting interests.

Additional functions are paid positions or jobs in addition to their job at/for Eagle Technology. One always requires written permission for additional functions from the HR department or the Board of Directors. This also applies to activities and work carried out for the benefit of your own company or legal entity, meaning that written permission from the HR department or Board of Directors is required.

Activities or work carried out as part of voluntary work is considered a sideline. For example, doing voluntary work for a sports club. No special permission is required, unless it poses a conflict of interest, or could possibly pose a conflict of interest in the future.

Having a (paid) sideline, in which the work or activities correspond, or show similarities, with the services Eagle Technology provides is not allowed. We can't allow you to be a competitor of your own employer.

3.6 Return of materials

(Leftover) materials are collected, transported and processed centrally. Everyone must abide by the specific rules Eagle Technology has drawn up on this subject.

3.7 Company/capital equipment

The company and/or capital equipment Eagle Technology has placed at the disposal of their employees are used for business purposes only. We expect our employees to treat their company/capital equipment with care, such as a company car, a commercial vehicle, a phone, protective clothing, tools and equipment and a laptop.

Employees who drive a company car are aware of the fact that being a reckless driver will reflect badly on the company image. They will obey traffic rules.

3.8 Using the internet, e-mail and social media

Eagle Technology has placed certain facilities, like computers, e-mail and internet at the disposal of their employees. These facilities are used for business purposes only, with the only exception being during breaks.

It is not allowed to use the internet or e-mail facilities for any unethical or illegal purposes.

Social media has become extremely popular over the last couple of years. The use of social media can, however, have unanticipated and/or unintended consequences. To avoid this, we have provided some tips and guidelines. Simply because you're not only an employee of Eagle Technology during, but also outside office hours.

- Know the Code of Conduct, and apply it to your activities on social media;
- Do not make statements on behalf of Eagle Technology;
- Don't post anything that will embarrass you when read by your mother or manager;
- One should avoid/prevent arguments;
- Do not spread any internal, business, or client information;
 - Do not post any opinions or information on/from another;
- Respect other opinions, religions, cultures, etc.;
- Don't forget: Internet and Google will remember everything!

3.9 Using a mobile phone

Using a mobile phone for personal use during working hours is very distracting and can be extremely annoying to your colleagues. It is not allowed, in a general sense, to use your mobile phone for private matters during working hours. We do believe that people should be able to reach you in case of emergency, and will allow you to strictly answer important calls.

Business phones ought to be used in a durable, ethical and cost-conscious manner. The use of business phones is recorded and monitored.

3.10 Alcohol and drug use

Our employees must refrain from using alcohol or drugs, such as cannabis, amphetamines or narcotics at work. This also applies to employees on guard or watch duty, for the extent of the time that they are on call. The use of alcohol or drugs outside working hours cannot hinder someone in the performance of their duties.

Considering the massive personal, company, and social damage it can entail, Eagle Technology has decided to pursue a zero tolerance policy regarding the use of drugs and alcohol. Our aim is to ban drugs and alcohol abuse among our employees.

Employees will make sure that they limit their alcohol intake during company or business events. For example at social organized by Eagle Technology, or during a business lunch. They will make sure, when participating in traffic, not to exceed the legal alcohol limit.

Whenever an employee is on medication that impairs their reaction time, he is not allowed to do any work that could potentially be a risk to his own safety, or the safety of others. In that case, one ought to contact the company doctor which steps or measures to take.

3.11 Employee profiles

Everyone can be, and is allowed to be themselves at our company, but the profiles given below show which characteristics create a bond between our people and are particularly valued and sought after.

A schematic representation of the employee profile.

Adapts his own needs and behaviour to the needs, priorities and goals of the organization.

LOYALTY

Sees opportunities, takes the initiative and is goal-oriented.

ENTREPRE-
NEURSHIP

Strives with passion and commitment to obtain great expertise and professionalism in his function in his field.

PROFESSI NAL
COMPETENCE

Takes responsibility and knows the rules, guidelines and procedures within the organization at the client and abides by them.

DISCIPLINE

The profile of a supervisor or manager:

Is aware of the way he manages, to set a good example in order for the employees of Eagle Tehnology of develop the desired behavior.

LEADS BY
EXAMPLE

Takes the personal and professional development of his team members seriously and stimulates and encourages them to be succesful.

EMPOWES
THE TEAM

Has extended jobspecific knowledge needed to solve complex problems and make tactical decisions.

IS
TECHNICALLY
PROFICIENT

Is goal-oriented and acts effectively and efficiently when the situation calls for it.

IS RESULT
DRIVEN

4. THE RELATIONSHIP BETWEEN THE EMPLOYEES AND EXTERNAL PARTIES

Eagle Technology maintains relationships with various external parties, like clients, contractors and suppliers. Eagle Technology strives to be a reliable and sympathetic partner which is known for doing business under one's own steam and identity.

4.1 Reliable partnerships

Eagle Technology is a reliable business partner to her external parties. We are clear and honest about what can be realised and we deliver on our promises. In doing business we aim for mutually beneficial business relationships.

4.2 Clients

Our clients have put their faith in us by choosing our company and services. We can only remain successful if we continue to work with the client's interests at the basis.

This means the following in terms of our behaviour:

- Act honestly and with integrity under all circumstances;
- Eagle Technology respects our client's privacy and freedom of speech. Clients entrust us with a lot of (sensitive) information, and they are counting on us to keep it safe and confidential;
- Client feedback is important in order to tailor our services to the client. You're supposed to take it seriously whenever a client has negative feedback on any of our products or services, and you should pass the information on to the department in question or to your supervisor. Use this feedback to improve our products and processes.

4.3 Suppliers

Suppliers play an important part in improving the general competitive position of our company.

We select our suppliers on the basis of competitiveness, integrity, impartiality, fair prices, quality of the goods on offer and/or services and social responsibility. We guarantee honesty and impartiality, but also take the supplier's reliability and existing relationships based on trust into account.

We refuse to do business with suppliers who violate and break international rules and regulations concerning (child) labour. Moreover, we consider it of great importance that all our suppliers commit themselves to respecting the basic principles of corporate social and economic responsibility and sustainability, also with regards to the environment. These requirements need to be met before Eagle Technology enters into a business relationship with any supplier.

4.4 Public institutions, public administration and other authorities and organizations

Our relationships with public institutions, public authorities and organizations are characterized by high moral standings of integrity, sincerity, collaboration and non-interference.

We keep in close touch with all international, national and regional authorities. Our company representatives act in our interest in a clear, conscientious and consistent manner, and with respect for company values and procedures. Any potential involvement of our personnel with political activities takes place on a strictly personal basis. Our brand may not be associated with this in any way, and the fact that the person in question works for Eagle Technology should not be used for political purposes.

4.5 Media contact

Media contact is exclusively maintained by the Communications department, members of the Board of Directors, or employees who are specially trained.

4.6 Competition

Eagle Technology recognises the value of competition, and with that the common interest and need to protect our competition for the sake of market development and the protection of consumer interests.

In doing business, we aim to abide by statutory laws and regulations of the countries we operate in with sincerity, honesty, integrity and good faith. We strongly disapprove of any practises that go against the basic principles of the competition or the open market. We consider this to be of vital importance to ensure an honest and high-quality competition.

4.7 Conflict of interest

We believe that doing business in good faith and being honest, respectful and sincere towards our (business) contacts is of vital importance, whether they are suppliers, clients, consumers or public institutions.

One should, therefore, avoid any conflict of interest, or even the semblance of a conflict of interest, between Eagle Technology's interests and your own.

When in doubt, ask yourself the following questions:

- Would this situation embarrass me or Eagle Technology when published on the front page of a newspaper?;
- Would I feel uncomfortable discussing the matter with my supervisor or the HR Manager?;
- Could I benefit from this situation at the cost of Eagle Technology?

When the answer to (one of) the above mentioned questions is yes, this situation should probably be avoided.

This can be, for example:

- Personal investments;
- Sidelines or additional functions;
- Investing with our business contacts;
- Accepting or giving of disproportional (promotional) gifts.

Give these matters considerable thought and avoid (the semblance of) a conflict of interest. If you should ever be in danger of finding yourself in such a situation of conflict of interest, make sure to contact your supervisor or the HR Manager.

4.8 Activities that could improve or create connections

Generally speaking, activities that could improve or create connections are allowed, provided that Eagle Technology can trust their employee to act with integrity and independence at all times.

4.9 Financial integrity

(Financial) integrity is of great importance to all employees of Eagle Technology. When, for example, you submit your expense report, but also when you enter financial data.

5. ANTI-BRIBERY AND CORRUPTION

5.1 What is bribery?

Definition of bribery:

- when a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly (it does not have to be the person to whom the bribe is offered that acts improperly); or
- when a financial or other advantage is requested, agreed to be received or accepted by another person with the intention of inducing or rewarding them or another person to perform their responsibilities or duties inappropriately (it does not have to be the person who receives the bribe that acts improperly).

It does not matter whether the bribe is:

- given or received directly or through a third party (such as someone acting on Eagle Technology behalf, for example an agent, distributor, supplier, joint venture partner or other intermediary); or
- for the benefit of the recipient or some other person.

Bribes can take many forms, for example:

- money (or cash equivalent such as shares);
- unreasonable gifts, entertainment or hospitality;
- kickbacks;
- unwarranted rebates or excessive commissions (e.g. to sales agents or marketing agents);
- unwarranted allowances or expenses;
- "facilitation" payments/payments made to perform their normal job more quickly and/or prioritise a particular customer;
- political/charitable contributions;
- uncompensated use of company services or facilities; or
- anything else of value.

This policy applies to both the public and private sectors. Dealing with public officials poses a particular high risk in relation to bribery and corruption and specific guidance when dealing with public officials is set out below. A breach of bribery laws can result in fines for both the company and the individual involved and in some jurisdictions could also result in imprisonment.

5.2 How do I know if something is a bribe?

In most circumstances, common sense will determine when a bribe is being offered. However, here are some questions you should ask yourself if in doubt:

- am I being asked to pay something or provide any other benefit over and above the cost of the services being performed, for an example an excessive commission, a lavish gift, a kickback or make a contribution to a charity or political organisation?;
- am I being asked to make a payment for services to someone other than the service provider?;
- are the hospitality or gifts I am giving or receiving reasonable and justified? Would I be embarrassed to disclose them?;
- when a payment or other benefit is being offered or received, do I know or suspect it is to induce or reward favourable treatment, to undermine an impartial decision making process or to persuade someone to do something that would not be in the proper performance of their job?

5.3 Policies and procedures

5.3.1 General prohibition

All forms of bribery and corruption are prohibited. We will not tolerate any act of bribery or corruption. Any breach of this policy or local law could result in disciplinary action being taken and ultimately could result in dismissal. A bribe does not actually have to take place - just promising to give a bribe or agreeing to receive one is prohibited. Bribery is prohibited when dealing with any person whether they are in the public or private sector and the provisions of this policy are of general application. However, many countries have specific controls regarding dealing with public officials and this policy includes specific requirements in these circumstances.

5.3.2 Gifts, hospitality and expenses

Giving or receiving gifts or hospitality is often an important part of maintaining and developing business relationships. However, all gifts and hospitality should be for a genuine purpose, reasonable, given in the ordinary course of business and should be submitted to the manager in case of doubt.

Lavish or unreasonable gifts or hospitality, whether these are given or received, are unacceptable as they can create the impression that we are trying to obtain or receive favourable business treatment by providing individuals with personal benefits. In addition, gifts and hospitality can themselves be a bribe. Be careful to avoid even the appearance that the giving or accepting of gifts or hospitality might influence the decisions you take on behalf of Eagle Technology.

5.3.3 Facilitation payments

Facilitation payments are any payments, no matter how small, given to an official to increase the speed at which they do their job. For example, this could include speeding up customs clearance. All facilitation payments are generally prohibited. However, your safety is our primary concern and we understand that there may be circumstances in which you have no alternative but to make a facilitation payment in order to protect against loss of life, limb or liberty. Any request for a facilitation payment should be reported to your local anti-bribery and corruption officer.

5.3.4 Agent, distributors, suppliers and joint venture partners

Eagle Technology could be liable for the acts of people that act on our behalf. This includes agents, distributors, suppliers and joint venture partners (together referred to as "third parties"). As such we are committed to promoting compliance with effective anti-bribery and corruption policies by all third parties acting on behalf of Eagle Technology.

All third parties should be made aware of the terms of the Eagle Technology Code of Conduct and of their obligations to comply with it. All arrangements with third parties should be subject to clear contractual terms including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption.

You must not engage any third party who you know or reasonably suspect of engaging in bribery. Appropriate due diligence should be undertaken before any third parties are engaged. The appropriate level of due diligence will vary depending on the circumstances and you should use your judgement on a case by case basis.

Questions you should be asking yourself include:

- who are they – have I seen documents evidencing that they are who they say they are?;
- who else have they worked with – do they have references?;
- are they well established with a good reputation or are they more obscure so that I need to do more to find out about them?;
- do they operate in a territory where bribery is prevalent?;
- are they happy to sign a contract agreeing to comply with anti-bribery procedures? Do they have their own anti-bribery programme?;
- have I done basic searches such as Google searches, business directory searches, etc.?;
- are there inconsistencies between the provider of the services and the person I am paying?;
- are commissions/payments in line with generally accepted market practice?

All payments and commissions to third parties must:

- be made in accordance with the Group Authority Framework and the local policies relevant in your business as set by your line manager;
- be made via bank transfer through the accounts payable system and be fully accounted for;
- must be in line with generally accepted rates and business practice for the service in question and should not be unjustifiably excessive or unsupportable; and
- must be made in accordance with the terms of the contract with the person or company providing the services.

If you have any concerns that arrangements with a third party are not in accordance with this policy, you should ask your local anti-bribery and corruption officer for help.

5.3.5 Dealing with public officials

Although this policy applies to both public and private sectors, dealing with public officials poses a particularly high risk in relation to bribery due to the strict rules and regulations in many countries.

Public officials include those in government departments, but also employees of government owned or controlled commercial enterprises, international organisations, political parties and political candidates.

The provision of money or anything else of value, no matter how small, to any public official for the purpose of influencing them in their official capacity is prohibited.

The prior approval of your local anti-bribery and corruption officer is required in relation to:

- any payment in respect of fees, salary or commission (this does not include official fees);
- gifts and hospitality; and
- making charitable contributions in connection with dealings with a public official.

In addition, many public officials have their own rules regarding the acceptance of gifts and hospitality, etc., and we must respect these rules where applicable.

In accordance with the Eagle Technology Code of Conduct, political donations by or on behalf of Eagle Technology are prohibited.

5.4 Compliance with the policy

It is the responsibility of your local anti-bribery and corruption officer to ensure compliance with this policy in each business. Ultimate responsibility for compliance with this policy throughout the group is taken by the HR department (HQ). However, each of us has an obligation to act with integrity and to ensure that we understand and comply with the policy. On-going compliance will be monitored and reported by Internal Audit. In addition, all employees will be required to confirm that they have understood and complied with the policy.

5.5 Whistleblowing

Eagle Technology is committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help. If you suspect or observe anything that you think might be in contravention of this policy, you have an obligation to report it. You should raise your concerns with your local anti-bribery and corruption officer in the first instance. Alternatively, you can report your concerns to the HR department (HQ). Eagle Technology will not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behaviour. All reports will be treated confidentially.

6. WHO IS RESPONSIBLE FOR WHAT?

The responsibilities with regard to the Code of Conduct are divided as follows:

- Supervisors within Eagle Technology are responsible for setting a good example and for making sure that all existing and new employees are familiar with the Code of Conduct;
- Members of the Board of Directors and supervisors keep a close watch on the observance of the Code of Conduct;
- Employees will act in accordance with the Code of Conduct;
- Every employee can be addressed on the degree with which his conduct corresponds with the Code of Conduct;
- Did you notice a violation of the rules? Report this to your supervisor and/or to the HR department;
- A violation of the Code of Conduct could lead to disciplinary measures. Serious violations could even end in dismissal.

Procedure for the suspicion of misconduct

You can take the following actions, depending on the situation, when you suspect someone of misconduct:

1. Examine the situation and consult the Code of Conduct for the relevant rules;
2. Discuss the situation with your supervisor;
3. Contact the HR department at the Eagle Technology Headquarter when in doubt or when you need advice. (post@eagle.no);
4. When it is a matter of misconduct, you should report this to the HR Department or to the confidential advisor.

The confidential advisor has the duty of confidentiality and is able to make an anonymous report on behalf of the informant.

If you want to make an anonymous report without any personal interference, you can send an anonymous letter to:

Eagle Technology
Sviensundveien 332
N-1788 Halden