

## Introduction

Blacknight is committed to the highest standards of transparency and business conduct. We act in a responsible way, based on our Code of Business Ethics. We advocate free and fair trade, striving for open and fair competition and ethical conditions within the legal frameworks of the countries where we do business.

## Purpose

The purpose of this Policy is to set common standards for all Blacknight business regarding compliance with our zero-tolerance policy towards any form of bribery and corruption, and in compliance with local laws of the countries where Blacknight do business.

This Policy relates to anti-bribery and corruption and applies to all employees of Blacknight.

Blacknight will strive to fully adopt these principles in all operations in which Blacknight has management control. We will also use our influence to promote the principles in other companies who deal with Blacknight.

## Principles

The following principles apply for the activities under this Policy:

- Blacknight has a clear statement against bribery and corruption, and does not accept bribery or corruption in any form.
- At Blacknight we do not offer, authorise or pay bribes or anything of value to obtain or retain business, or to encourage or reward a decision.
- No employee of Blacknight Company shall offer, provide, authorise, request, accept or receive a bribe either directly or indirectly, including through any third party. It is prohibited to contribute financial means to any third party in a way that could constitute negligent financing of corruption.
- It is important to make sure that money paid to third parties, for example to agents, partners, vendors and consultants, is not used for corruption.
- Breaches of this policy are investigated, and necessary precautions and actions taken to eliminate or mitigate the risk for bribery and corruption in relation to third parties.

All procurement activities at Blacknight are performed in compliance with the Procurement Process, which clearly states the basic principles for a fair selection of suppliers and segregation of duties.

## Supplier Code of Conduct

The Supplier Code of Conduct includes a strict prohibition for all forms of corruption, including but not limited to extortion, bribery, facilitation payments, nepotism, fraud and money laundering.

- At Blacknight we avoid an interest or situation that conflicts, or may appear to conflict, with our professional duty.



- Blacknight employees are expected to always act in Blacknight's best interest and to exercise sound judgement, unaffected by private interests or divided loyalties. All employees are prohibited from making or accepting facilitation payments, i.e. payments made to government officials or third-party suppliers to encourage or ensure that routine procedures are carried out or speeded up.
- Blacknight employees can only accept business hospitality and gifts proposals if they are open, reasonable, demonstrate a clear business objective, are appropriate for the nature of the business relationship.
- Blacknight do not allow gifts, apart from branded items of minimal value, to public officials.

## Administrations or governing bodies

- We do not permit charitable or political donations or sponsorships as a way of concealing a bribe. It is never acceptable to make donations to political parties where there is a potential commercial conflict of interest.
- We keep accurate and transparent financial books and records. This includes the requirement that gifts and hospitality as well as sponsorships and donations are recorded to reflect the nature and purpose of the activity. We also require and keep records of the needed approval documents and verification of third parties.
- These principles apply as long as they do not place Blacknight in violation of domestic laws and regulations

## Breaches against this policy

Any Blacknight employee who suspects violations of The Code of Business Ethics or this policy must speak up and raise the issue to their line manager, or directly to the CEO. Speaking up is encouraged when an employee, in good faith, believes they have observed or are aware of a potential violation of The Code of Business Ethics, this policy or the law. Should an employee wish to remain anonymous Blacknight will provide a drop-box for anonymous disclosure which is located in our Carlow headquarters in the canteen area.

When an employee does speak up, Blacknight expressly forbids any form of retaliation. Any action or behaviour that could be seen as a violation of this Policy must be promptly and appropriately handled, either by being corrected or reported for further handling