

## **ANTI-BRIBERY AND ANTI-CORRUPTION CODE OF CONDUCT**



### **General**

It is our policy to comply with all applicable laws, rules and regulations.

In particular we follow all legislation governing bribery and corruption in all the countries in which we operate.

The purpose of this code of conduct is to set out the values, principles and responsibilities MicroDoc adheres to and expects from all of our managers, employees and business partners.

Compliance with this code is a mandatory requirement for all managers and employees.

### **PROHIBITION OF ALL FORMS OF BRIBERY AND CORRUPTION**

MicroDoc does not participate in any form of bribery or corruption, now and in the future and has a zero tolerance for cases of bribery or corruption.

MicroDoc will deal with any instance of suspected or actual bribery or corruption immediately.

Any actual instance of bribery or corruption will result in an action against those involved. The counter measures are immediate and are including termination of employment or other forms of contracts, and reporting the case to applicable authorities.

This policy is valid for all regions and countries we do business in and is applicable for all subsidiaries.

Reporting of suspected and actual cases of bribery or corruption is required for all employees and managers even if the report is putting business interests at stake. No reporter of suspected and actual cases of bribery will suffer any disadvantages by reporting the case. Not reporting suspected and actual cases of bribery or corruption is considered a violation of the obligation of employees and managers of MicroDoc.

MicroDoc will check for cases of bribery or corruption on a regular basis and take respective actions. The actions will include termination of contracts, seeking help from legal advisors and the institution of legal proceedings.

### **DEFINITION**

Bribery is the offering, accepting, giving and promising of any inappropriate monetary or other advantage to or by another person or institution.

Corruption includes solicitation of bribery and any associated potential threads.

MicroDoc rates any personal favor or kickback to contracting parties as a bribe.

MicroDoc rates the engagement of intermediaries such as agents, subcontractors or consultants to transfer payments to a contracting party a potential bribe.

All payments or other advantage made to anyone who is not fully recorded in the terms of a contract by which MicroDoc does business with, shall be deemed to be a bribe.

## **SCOPE**

Every employee and every person associated with MicroDoc's business is covered by this Code of Conduct and our Anti Bribery Management System as an individual.

All rules defined in our Code of Conduct apply world wide in every country and legislation. All rules defined in our Code of Conduct also apply for third parties acting on behalf of MicroDoc (i.e. agents, partners, resellers).

We only do business with third parties who comply with this Code of Conduct or implement similar rules and regulation with the goal to avoid, detect and fight bribery and corruption.

## **THIRD PARTIES**

Whenever MicroDoc engages with any third party in connection with any business, MicroDoc will investigate to determine the credibility of such party and whether such parties adheres to applicable laws as far. Any findings will immediately be reported to the Managing Directors.

Even after engaging with a third party every employee manager is obliged to continuously verify the adherence of a third party engagement with the terms of the Code of Conduct.

Third parties (persons or entities) who provide goods or services to MicroDoc or on MicroDoc's behalf must meet our standards and accept and comply with this Code of Conduct.

All payments to third parties made by MicroDoc must be warranted, transparent and correct and must be properly recorded in the MicroDoc books.

## **RESPONSIBILITY**

MicroDoc's Anti-Bribery Officer or a dedicated substitute is responsible for administration and enforcement of this Code of Conduct. MicroDoc's Anti-Bribery Officer has the responsibility to maintain, adapt to legal changes and improve the Anti-Bribery-Management-System (ABMS) in MicroDoc and has to seek and renew a certification of the ABMS according to ISO 37001 standard.

MicroDoc's management is ultimately responsible for compliance and will review the implementation of this Code of Conduct for adequacy and effectiveness from time to time and will report any findings to MicroDoc's ownership.

## **REPORTING AND WHISTLEBLOWING**

MicroDoc expects all employees and managers as well as any third party involved in business with MicroDoc to report suspicious activity without delay.

Anonymity is guaranteed for whistleblowers. All employees and managers as well as any third party involved in business with MicroDoc is encouraged and invited to contact MicroDoc's Managing Directors in case of suspected or actual cases of bribery or corruption.

## **FINANCIAL TRANSACTION**

All of MicroDoc's financial transaction are maintained correct and understandable and are subject to audits by certified auditors.

## **HOSPITALITY AND GIFTS**

MicroDoc only accepts or provides hospitality and gifts within defined limits and during the ordinary course of business.

All inbound or outbound gifts and hospitality must be recorded by the receiver or donator in the ABMS.

Any gifts and hospitality provided or accepted beyond the defined limits must be approved by the Managing Directors.

Cash may not be received from or given to any third party.

Promotional items of small value such as coffee mugs or t-shirts with the company logo may be distributed for advertising or marketing.

These rules apply for customers, agents, contractors and competitors of MicroDoc.

If the refusal to accept a gift would be taken to be a major offence, the gift may be accepted but must be submitted to charity.

MicroDoc does not pay for third parties' travel or other expenses except for travel of candidates to a personal interview in a MicroDoc location or if defined in a proper contract.

Expenses must not go beyond what is reasonably necessary for the business purpose.

## **POLITICAL AND CHARITABLE CONTRIBUTIONS AND SPONSORSHIPS**

Sponsorship, political and charitable contributions require authorization by the Managing Directors.

MicroDoc does not make any contributions to political parties, representatives or candidates.

MicroDoc is not against sponsorship or charitable donations as long as they are not given in return or in advance for personal favors.

## **WHISTLEBLOWING PROCEDURE**

MicroDoc maintains a policy of open communication. Every employee and manager is encouraged to report any suspect or actual act of bribery or corruption to the managing directors or MicroDoc's ownership.

MicroDoc also provides for anonymous reporting in case some person does not want to disclose his/her identity.

"Whistleblowing" is the disclosure of information which relates to suspected wrongdoing including: criminal activity, failure to comply with any legal or professional obligation or regulatory requirements, fraud, negligence, breach of our internal policies and unauthorized disclosure of confidential information.

MicroDoc employees and managers will not suffer any detrimental treatment as a result of raising a concern as whistleblowers.

The MicroDoc's managing directors have the overall responsibility for this policy and for reviewing the ABMS and the effectiveness of actions taken in response.

Any questions or concerns relating to this policy should be addressed to MicroDoc's CEO directly