

Anti-corruption policy and guidelines – Artisti AS

Passed by Artisti AS board. Last modified March 12, 2026.

Purpose

This document describes Artisti AS' principles and guidelines for combating corruption. The aim of the document is to increase the awareness of each employee about the subject of corruption and thereby be able to identify cases of corruption.

The guidelines in this document are in accordance with our vision, our values and ethical rules and our corporate social responsibility.

Our internal guidelines and rules come in addition to the external framework set by the Criminal Code (§ 276a-c).

The company's manager must ensure that employees know the guidelines, and the individual employee is responsible for learning and following them. Management is responsible for maintaining content and expanding employee knowledge and awareness about the guidelines.

Scope

This policy applies to:

- All employees of Artisti AS
- The board and management of Artisti AS
- Temporary employees and hired resources
- Representatives acting on behalf of the company, including agents, consultants and other business partners

Training

Artisti AS shall ensure that employees receive the necessary training in anti-corruption and ethical guidelines.

Background

Artisti AS works in line with international standards for responsible business, including the OECD guidelines and the UN Global Compact.

Artisti AS operates a business that relies on trust from our customers and their customers, authorities, and society.

Achieving the necessary trust depends on professionalism and skill, where all employees maintain a high ethical level. This applies both to our business operations and the behavior of each of us. It is therefore expected that everyone acts with caution, reasonableness and objectivity, and refrains from actions that may impair the trust of the company.

Managers must be particularly careful and appear to be good examples for others.

Corruption – definitions

Corruption occurs if someone abuses their trusted position to achieve personal or business benefits for themselves or others.

Corruption is prohibited under the Norwegian Criminal Code. The Penal Code defines

corruption as both active and passive corruption, as well as influence trade (bribe).

Active corruption is when someone offers another an undue advantage in the event of position, appointment or assignment (an attempt to bribe someone).

Passive corruption is when someone requires, receives or accepts an offer for improper benefit in the event of position, office or assignment (to be bribed).

An advantage is everything the recipient can benefit from and does not have to be money or valuables.

Our guidelines for combating corruption

Artisti AS does not accept either active or passive corruption.

Artisti AS has a policy not to accept paying public officials, controllers, or others for facilitating payments. This applies regardless of the size of the claim. Such claims must be rejected firmly and clearly.

No one must receive benefits from the company's partners or suppliers, such as gifts, discounts, travel or bonuses in private purchases, loans or similar. This also applies to employees' close relatives if the benefit has a background in the employment relationship. Except from this rule are the company's benefits that have been achieved for all employees.

Gifts and representation

On special occasions, however, it is allowed to receive small gifts of the legal limited value, up to NOK 1000,-.

Gifts given on behalf of the company to our clients must have a downside level and not exceed the value limit for what we accept to receive.

Our motives and our recipient's integrity should not be in doubt. No one may give gifts or other benefits on behalf of the company for the purpose of obtaining rewards for their own benefit.

Employees of Artisti AS shall not offer or receive gifts, services or other benefits that may influence, or appear to influence, business decisions.

Moderate gifts or entertainment may be accepted if they are of limited value, are done openly and are in accordance with normal business practice.

Conflicts of interest

Employees must avoid situations where personal interests may conflict with the interests of the company.

Any conflicts of interest must be reported to their immediate manager.

Events

Events organized by Artisti AS must have relevant academic and professional content and otherwise be marked with caution.

If the event entails travel and accommodation for those invited, this should clearly be stated in the invitation that the invited person can arrange for himself or we can help with this.

However, at our events that have relevant academic content, Artisti AS can cover accommodation expenses for the invited guests because the purpose of the event is lectures, courses, and training.

If employees in Artisti AS are invited to seminars or similar by suppliers or other business

associates, we as a company will cover travel expenses. Accommodation is also covered by us. However, if the purpose of the invitation is academic learning, accommodation costs may be covered by the business relationship.

Openness

Our business is to be characterized by openness.

The anti-corruption policies are intended as a guiding tool, but do not say anything about what is right and wrong in all situations. In case of doubt about what is legal or within the guidelines, you should address the issue with your immediate superior.

Whistleblowing and reporting of concern

Whistleblowing is the act of reporting critical matters to someone who can do something about them. Employees are encouraged to report critical matters so that they can be corrected. Corruption is a criminal offense that all employees have a duty to report.

As a starting point, you must report in writing or verbally to your immediate superior, trustee or board of directors.

In the event of a non-management whistleblowing, the company's law firm may be notified. They will then ensure confidentiality and anonymity.

Suspicious of corruption or other unethical matters should be reported through the company's whistleblowing channels.

Artisti AS does not tolerate retaliation against people who report concerns in good faith.

Sanctions

Violation of the company's guidelines will have consequences in accordance with the guidelines laid down in the Working Environment Act (AML) and applicable tariff agreements. All sanctions shall be considered by the general manager or chairman before implementation.

Internal control questions

The following questions may be helpful if you are unsure whether you can attend an event, accept an invitation, or receive a gift. This is not a complete list, but only a tool.

1. Are you willing to defend the relation publicly? Is it okay for you to tell your neighbor?

This is called the public principle. If the answer is no to one or more of these questions, it should be a warning sign.

2. Is the gift / invitation given in full transparency?

If the answer is no, you will not attend events. Please decline the invitation /the gift. You should also inform your immediate superior about the situation.

3. Would I be offered this if I had a different position?

If the answer is no, you should think about it. In some situations, it is okay to accept the offer anyway. However, it is important that you are open about the relationship and talking to others. In case of doubt, you should take the matter with your immediate superior.

4. What is the purpose of the gift / invitation?

Here there are no clear rules for what is right and wrong. Questions you should ask are whether it is expected to be refunded if the gift / invitation is given directly to you or to the company if the gift / invitation is given hidden or open and whether you are in an offer or negotiation situation. If you think the purpose of the gift / invitation is suspicious you should decline. It is important that you are open and talking to others about it. In case of doubt, you

should take the matter with your immediate superior.

5. Are we in an offer / negotiation situation?

If we are in a bargaining or negotiating situation with the sender of the gift / invitation, you should be very careful about what you are grateful for. To receive a gift / invitation from someone we are in an offer or negotiation situation with, can easily be perceived as so-called trading in influence. In such a situation, always take the matter with your immediate superior.

6. Is the gift / invitation given to a person or to the company?

Gifts / invitations aimed at a particular person are often more suspicious than gifts / invitations that go to the company. Ask yourself why the gift / invitation goes to you personally and not to the company? What is the purpose of the gift / invitation? In such a situation you should be open about the relationship and talk to others. This applies even if the gift / invitation goes to the company and not you personally.

7. Is the gift / invitation given to many or just one?

If the gift / invitation is given to only one person, the relationship is generally more suspicious than if it is given to more.

Here, it is important to be open about the situation and talk to others. If you are the only one who receive the gift / invitation, you should address it with your immediate superior.

8. Expected reciprocity?

If the answer is yes, you should, as a rule, decline the invitation / gift. If you are unsure, you can take the matter with your immediate superior.

9. Significant - insignificant value?

If the value is significant, you should, as a rule, decline. If you are still unsure, you can take the matter with your immediate superior based on case and situation, considering whether you can keep the gift / accept the invitation.

As a rule, you would have to decline.

10. Could we give a gift of the same value? Could we have given a similar invitation?

If the answer is no, do not accept the gift / accept the invitation. In case of doubt, you should take the matter with your immediate superior.

11. Is the gift delivered at home or at work?

If the gift is delivered home for the purpose of keeping it hidden, do not accept.

12. Who pays travel and stay?

Travel expenses must always be covered by Artisti AS. Accommodation expenses can be covered by the person who invites if the purpose of the invitation is academic and professional courses, but in all other cases, accommodation will also be covered by Artisti AS. If in doubt you should take the matter with your immediate superior.

13. Is professional and academic content of sufficient quality and relevance?

If the answer is no, decline the invitation. In case of doubt, you can take the matter with your immediate superior.

Document version log:

Date	Changes applied	Responsible
13.04.2021	Change in format	Monica Nilsen
24.11.2023	Name change – Artisti Profil AS -> Artisti AS	Monica Nilsen
12.03.2026	Added scope, conflicts of interest, gifts and representation and training.	Monica Nilsen