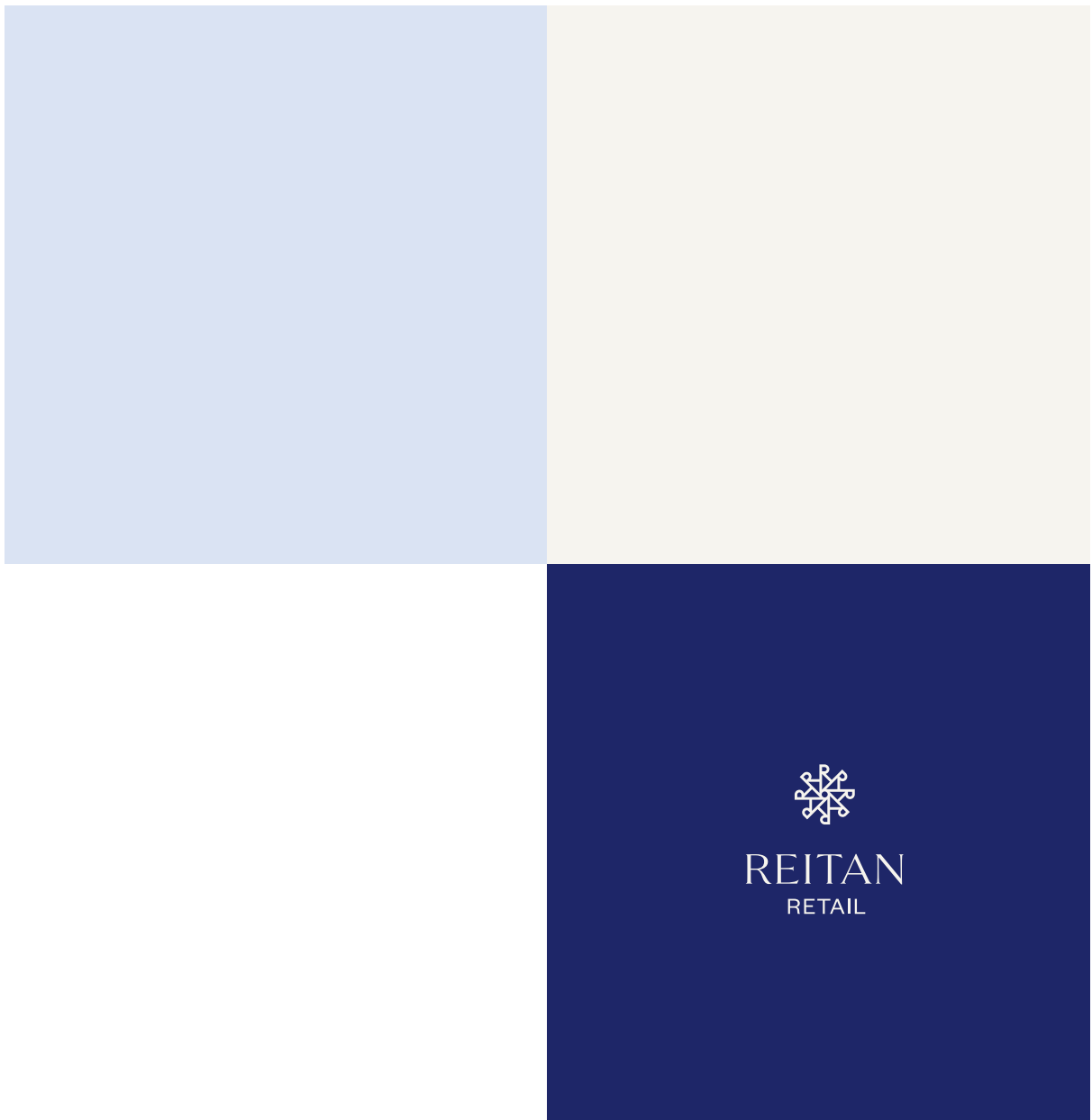


Reitan Retail

# Anti-Corruption and Anti-Money Laundering Policy



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# 1 Introduction

## 1.1 General

Reitan Retail and our subsidiaries are obliged and committed to conduct our business within the framework of applicable laws in the countries in which we operate, and the highest ethical standards. This commitment is embodied in Reitan Retail's Code of Conduct.

Engaging in corruption, bribery and money laundering may not only have serious effects on our business, but also undermines legitimate business activities, distorts competition, could entail imprisonment and other civil and criminal liability, and prevents the realisation of human rights.

The purpose of this policy is to clarify Reitan Retail's, and our subsidiaries' position on Anti-Corruption and Anti-Money Laundering to our employees and representatives. This policy applies, regardless of location, to all employees as well as to all franchisees, temporary personnel, consultants, and others who act on behalf of or represent Reitan Retail or its subsidiaries, and to the members of the Board of Directors of Reitan Retail. By getting acquainted with this policy we aim for the above-mentioned representatives to have the ability to handle difficult situations that may occur.

## 1.2 Training and awareness

All the above-mentioned representatives must familiarise themselves with this Anti-Corruption and Anti-Money Laundering Policy and have full understanding. Managers at every level are responsible for ensuring this understanding. To emphasise the importance, mandatory digital training is to be executed by all on an annual basis.

## 1.3 Suppliers

Suppliers of Reitan Retail, or any of our subsidiaries shall comply with applicable laws concerning corruption, bribery, and money laundering. Our stand is described in a separate section in the supplier code of conduct (SCoC). Reitan Retail works consistently to have all suppliers to sign the SCoC.

# 2 Anti-Corruption

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. Bribery is offering payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage.

Reitan Retail do not tolerate any form of bribery and corruption in any form. Reitan Retail shall always be compliant with applicable anti-corruption laws, and our employees or other representatives must not offer, nor accept anything that could call into question the company's professionalism and ethical way of conducting business.

Offering or accepting hospitality, such as social events, meals and entertainment, may only be acceptable if (i) there is a clear business rationale behind it, (ii) the host is present, and (iii) the cost of such hospitality is reasonable. Exercise caution and good judgment in relation to the reasonableness and proportionality of offering or accepting hospitality which shall be proportionate to the markets in which the hospitality is being offered or taken. The cumulative impact of multiple events of hospitality shall be taken into account when judging the proportion. Managers of the relevant subsidiary shall be consulted in the case of uncertainty on whether hospitality should be accepted or offered.

Travel and accommodation expenses for our employees or representatives shall always be paid for by the relevant Reitan Retail company, and not by the third party offering the hospitality.

Gifts and hospitality do not place the recipient under any obligation, and no expectations are created. Given that the nature of the gift or hospitality must be appropriate to the relationship between the giver and receiver, our employees or representatives may never request or solicit gifts or hospitality from business relations or third parties seeking to do business with Reitan Retail or our subsidiaries. No gifts or hospitality shall be given or received whatsoever if the gift or hospitality could influence or be perceived to be capable of influencing a procurement and sales process, contract negotiation or transaction.

Gifts and hospitality are only offered or accepted when they are of a modest value and serve a clear professional purpose. Gifts and hospitality of high value are declined. All gifts, except promotional items of minimal value, and all hospitality must be reported to the Manager of the relevant subsidiary without undue delay. This includes gifts and hospitality that have been offered which has been declined or returned.

### **3 Anti-Money Laundering**

Money laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses. Reitan Retail is committed to complying fully with anti-money laundering laws throughout our operations. We will conduct business only with reputable customers and suppliers, involved in legitimate business activities with funds derived from legitimate sources.

Reitan Retail or our subsidiaries will neither engage into nor tolerate any arrangement which facilitates or appears to be used to facilitate any acquisition, retention, use or control of any money payments intended to disguise the proceeds of crime. In order to avoid being involved in money laundering, employees or representatives must ensure that adequate background checks (integrity due diligence) are conducted to confirm the identity and ownership of business partners when this is considered necessary. Reasonable steps must be taken to prevent and detect unacceptable and suspicious forms of payment.

## 4 Report your concern

Reitan Retail is a value-based business, where openness is central. We have an open communication policy, and welcome being notified by anyone of conduct they perceive as unethical.

If you are an employee or representative of Reitan Retail and suspect a possible violation of the Anti-Corruption and Anti-Money Laundering Policy, or other unethical conduct, it is your duty to report this immediately. Please report possible violations or other unethical conduct to your manager or their manager's manager or use the company's whistleblowing channel processed by our PwC. The whistleblowing channel is open and available to all stakeholders of Reitan Retail. We also encourage suppliers and partners to notify us of misconduct in our business.

<https://www.reitanretail.no/en/responsibility/whistleblowing>

The whistleblower can choose to be anonymous.

Reitan Retail prohibits any form of retaliation against whistle-blowers for making a good faith report of misconduct.



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