

Anti-Corruption Policy



Purpose & Objective

This Anti-Corruption Policy outlines the principles and guidelines that DAZOQ AB and its subsidiaries (collectively referred to as “DAZOQ” or “we”) follow to establish a strong stance against corruption and bribery. The objective of our anti-corruption policy is to ensure strict adherence to anti-corruption and bribery procedures across all our operations, thereby preventing any infringements of relevant laws and regulations.

Scope

This policy applies to all employees, directors, shareholders and any third-party representatives acting on behalf of DAZOQ AB in all locations where we conduct business. In order to decide whether something potentially can be seen as bribery, the employee should consider the recipient’s influence and involvement in past, present and future business matters. They should also factor in the timing and context of the gift to determine if it is appropriate or could potentially be seen as bribery. Violation of this policy will result in severe consequences including disciplinary actions, up to and including termination of employment and potential referral to the appropriate criminal or regulatory authorities.

Policy Requirements

DAZOQ AB is committed to maintaining zero tolerance for corruption and bribery. To achieve this, we have established the following principles and controls within our business:

1. Bribes & Facilitating Payments

We strictly prohibit the offering or acceptance of bribes, facilitating payments, or any act that provides personal benefits for improper advantages. This includes payments made to government officials to expedite or facilitate routine, non-discretionary government actions, regardless of common practices in a particular country.

2. Charity & Donations

We do not make donations linked to obtaining improper advantages. Any charitable or political donations must be made in compliance with applicable laws and regulations.

3. Gifts & Entertainment

We do not provide gifts or entertainment to clients, government officials or other prospects, including their family members unless such expenses are incurred while conducting legitimate company business and are consistent with this policy and our related policies. However, modest gifts, hospitality or certain other things of value that are legal and directly related to the promotion or demonstration of DAZOQ’s services or can be seen as appropriate are allowed.

4. Travel, Lodging & Related Expenses

We do not provide travel, lodging, or related expenses with the intent to improperly influence a business decision or official action.

5. Hiring Practices

We strictly prohibit the use of job placements, future employment offers, or internships for the purpose of improperly influencing a business decision.

6. Payment & Recordkeeping

All relevant expenditures must be properly documented, approved, and maintained for a minimum of five years, unless local law or regulations require a longer retention period or disposal in less than six years.

7. Third-Party Representatives

We are required to check the background, reputation, and business capability of any third-party representatives before engaging or contracting with them. Additionally, we will implement additional controls for higher-risk relationships.

8. Education & Training

We are committed to providing appropriate education and training to employees to ensure a clear understanding of the Anti-Corruption Policy and their role in maintaining compliance.

Monitoring and Reporting

DAZOQ AB will monitor compliance with this Anti-Corruption Policy. All individuals covered by this policy are obligated to promptly report any violation or suspected violation to the appropriate Compliance channel.

By adhering to these principles and controls, DAZOQ AB aims to foster a culture of integrity, transparency, and ethical conduct throughout the organization, ensuring that we operate in compliance with all relevant anti-corruption laws and regulations.