



ANTI-CORRUPTION POLICY

Boxon is a member of the United Nations Global Compact and therefore committed to their principles. As part of this commitment and our values, the present policy governs the ethical principles of business conduct that apply to every business relationship and collaboration with Boxon. This Anti-Corruption Policy (the “Policy”) concerns Boxon and its subsidiaries (collectively, the “Boxon”) and applies to all employees of the Corporation, without exception. This includes executive management and all staff employed with the Corporation and affiliated companies and members of the board of directors (collectively, the “Employees”) as well as partners, suppliers, and customers to the Boxon.

Boxon expects its Partners, Suppliers, Customers and Employees to adhere to the highest standard of ethical conduct:

- Any form of corruption is rejected, and extortion or bribery will not be tolerated.
- Any violation of this principle can lead to the termination of the business relationship and will be reported to national and/or international authorities.
- Any violation of this principle by an employee can lead to termination of employment.

Partners and Suppliers are required to implement governance rules within their organization to comply with the applicable laws and regulations.

Partners and Suppliers are expected to provide, on a regular basis, adequate training to their employees and executives and the most exposed employees. Boxon suppliers are required to disclose to Boxon any situation that may appear as a conflict of interest and disclose to Boxon if any Boxon employees under contract with Boxon may have an interest of any kind in the supplier’s business or any kind of economic ties with the supplier.

Partners and Suppliers will not solicit or except for themselves any offer, promise, gift, or benefit to make illegitimate use of their influence with a view to taking or obtaining any favourable decision. However, Boxon accepts gifts or entertainment if they are consistent with common business practices, are not excessive in value and are not intended to influence a decision and if they do not violate applicable law. Partners and Suppliers are expected to compete on the merits of their products and services.

Partners and Suppliers undertake to exert reasonable due diligence to prevent and detect corruption and influence peddling in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants. They undertake to cascade all their commitments related to Compliance and Corporate Responsibility as specified in the **Boxon Supplier Code of Conduct** to their subcontractors, suppliers, or service providers, if any and when applicable.

Customers will not solicit or except for themselves any offer, promise, gift, or benefit to make illegitimate use of their influence with a view to taking or obtaining any favourable decision. Boxon will compete on our merits of our products and services.



In order to avoid the undetected occurrence of cases of corruption in our company, employees are regularly trained in this area. Boxon employees are required to follow this policy and not engage, nor accept, in any arrangement with Partners, Suppliers and Customers that could violate this policy or in any way gain personal benefits from business arrangements and agreements with its Partners, Suppliers and Customers. Boxon employees are required to disclose to senior management any situation that may appear as a conflict of interest or if violating applicable laws.

Our operations and behaviour shall always be characterised by our values and all our operations at Boxon shall be characterised by a high ethical standard. In the event of a violation of this policy or if a violation is suspected, the CEO, CFO or HR director must be informed immediately. All reports and messages will be investigated with the utmost confidentiality, care, and responsibility until they are fully clarified.

This policy has been reviewed and approved by the CEO. It has been communicated and made available to all employees. The policy is valid until further notice and will be reviewed regularly.