



Global Anti-corruption Policy

Corruption is illegal and unethical. It harms economic development, distorts competition, and undermines the rule of law. Failure to address the risk of corruption can damage Altera's reputation and lead to investigations, fines, and other penalties for the company and individuals.

Altera is committed to conducting business in accordance with the highest standards of ethics, transparency, and integrity. We comply with all applicable anti-corruption law, and we prohibit corruption of any kind, including bribery, kickbacks, trading in influence, and facilitation payments.

Altera directors, employees, and staff must read and comply with this Policy, the Global Anti-corruption Program Standard, and any other applicable related requirements.

To fulfil our commitment we:

- Do not engage in any form of corruption, including bribery, kickbacks, trading in influence, and facilitation payments
- Take particular care when dealing and communicating with public officials
- Only give or accept gifts and hospitality that are for a legitimate purpose, reasonable and appropriate in nature, and accurately recorded in our records. We do not give or accept gifts or hospitality that are intended or could be interpreted as a bribe or an attempt to improperly influence a decision or activity
- Do not make charitable donations that could be interpreted as a bribe or an attempt to improperly influence a decision or activity
- Do not make political contributions and ensure that any lobbying activities are legitimate and in compliance with applicable law
- Confirm the ethical and reputational reliability of our suppliers and business partners through appropriate risk-based due diligence and require our suppliers and business partners to commit to our anti-corruption and ethical expectations
- Conduct thorough pre-acquisition due diligence in connection with any mergers and acquisitions and take prompt action to address any identified issues
- Ensure our accounting and business records are accurate and complete
- Empower and expect directors, employees, and staff to make ethical decisions, even where operations may be impacted
- Empower and expect directors, employees, and staff to report concerns about corruption or unethical behaviour

INGVILD SÆTHER
President & Chief Executive Officer
Altera Infrastructure Group Ltd.

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