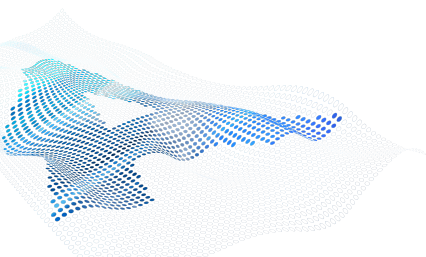


ANTI-CORRUPTION AND ANTI-BRIBERY POLICY
ARCTIC STREAM

Version	Date of update	Description of changes	Approved by
1.0	10.05.2025	Initial version	Governing Body
1.1	6.06.2025	Updated after CPCA audit	Governing Body

Any updates to the hereby policy, including those following compliance monitoring sessions, will be reflected in this table, ensuring traceability.



At **Arctic Stream**, integrity and ethical conduct are fundamental to our operations. We pledge a zero-tolerance approach to corruption in all its forms, a commitment rooted in compliance with Romanian legislation, including Law no. 78/2000 on preventing, discovering, and sanctioning corruption acts, and applicable global standards such as the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

This policy reflects our unwavering commitment to ethical practices and applies to all employees, contractors, and business partners. Through clear rules and ongoing training, we aim to ensure all individuals associated with Arctic Stream act responsibly and transparently in their professional duties.

1. Purpose

The Anti-Corruption Policy establishes the framework for identifying, preventing, and addressing corruption risks while promoting a culture of integrity. It also ensures compliance with legal and ethical standards, safeguarding the company's reputation and operations.

2. Scope

This policy applies to all employees, contractors, third-party representatives, and partners. It governs interactions with private entities, public authorities, and state-owned enterprises, ensuring compliance with Romanian anti-corruption laws and international regulations. For the purpose of this policy, the terms outlined below are defined as follows:

Bribery refers to the act of offering, promising, or giving, as well as the act of authorizing the offering, promise, or giving of money or other benefits (including loans, contributions, donations, entertainment activities, travel, accommodation, job offers, discounts, services, or other items of value), including any advantage, to any person to persuade the recipient or another person to perform, not perform, expedite, or delay the performance of an act within their official duties or to perform an act contrary to their duties.

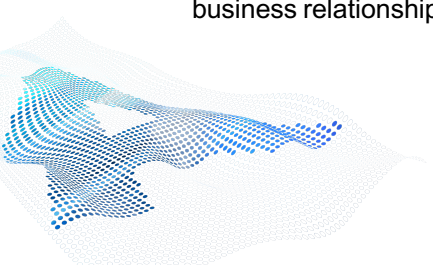
Bribery also includes the act of requesting, receiving, confirming receipt, or accepting money or other benefits, including any advantage, to perform, not perform, expedite, or delay the performance of an act within their official duties or to perform an act contrary to those duties. It does not matter if the bribe is:

- (a) offered or received directly or through a third party (such as someone acting on behalf of the Company, such as an agent, business partner, supplier, or other intermediary); or
- (b) for the benefit of the recipient or another person.

The Company also includes in Bribery acts similar to those mentioned above in its relations with representatives of clients, suppliers, or business partners.

Buying influence refers to the promise, offering, or giving of money or other benefits, for oneself or another, directly or indirectly, to a person who has or claims to have influence over a public official to persuade them to perform, not perform, expedite, or delay the performance of an act within their official duties or to perform an act contrary to those duties. The Company also includes in Buying Influence acts similar to those mentioned above in its relations with representatives of clients, suppliers, or business partners.

Close Friend means any individual with whom an Employee or Contractor has a significant social or business relationship outside of their work for the Company. This includes colleagues, clients, and business



partners with whom the Employee or Contractor has had a prior relationship during their employment with the Company.

Company refers to Arctic Stream S.A., a Romanian company with its headquarters in Romania, Emanoil Porumbaru 93-95, 2nd floor, Sector 1, Bucharest, 011424, email office@arcticstream.ro, registered with the Trade Register under number J40/14595/2017.

Conflict of interest occurs when personal activities or relationships interfere (or appear to interfere) with the objectivity, professional judgment, and decision-making of the Company's Employees or Contractors, potentially preventing them from acting solely in the Company's best interests. Conflicts of interest encompass a wide range of behaviors and circumstances and typically arise when two or more parties have differing interests and an obligation of trust or diligence exists between them.

A conflict of interest exists when an Employee's or Contractor's private interests may lead them to act in a manner that undermines the Company's interests or places the Company at a disadvantage.

Contractor (or Partner) refers to any person, regardless of their professional or corporate organization, who provides services to the Company or performs specific works and has obligations of diligence and trust towards the Company.

Corruption refers to the discretionary use of a position or function through illicit or illegal means to obtain personal or group interests. According to the law, acts of corruption can include bribery, influence peddling, or the buying of influence. Acts of corruption may occur before or after the recipient has improperly fulfilled their duties.

Employee refers to an individual who has an employment relationship with the Company based on an individual employment contract.

Financial Interest is defined as (a) owning 5% or more of the shares or other securities (including, for the purposes of this policy, any form of equity or ownership interest, regardless of whether it is publicly traded or privately held) in a public or private company or any other entity; or (b) having the right to receive payments or other benefits from an entity, in any form (including, but not limited to, bonuses, salaries, consulting fees, royalties, rental income, or the right to reimbursement of principal or interest on a loan).

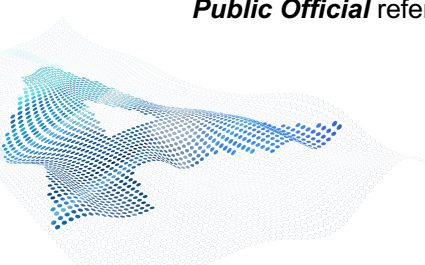
Giving bribes refers to the promise, offering, or giving of money or other benefits in connection with the fulfillment, non-fulfillment, expediting, or delaying of an act within the official duties of a public official or performing an act contrary to such duties.

Influence peddling refers to the act of requesting, receiving, or accepting the promise of money or other benefits, directly or indirectly, for oneself or another, committed by a person who has or claims to have influence over a public official and promises to persuade them to perform, not perform, expedite, or delay the performance of an act within their official duties or to perform an act contrary to their duties. The Company also includes Influence Peddling acts similar to those mentioned above in its relations with representatives of clients, suppliers, or business partners.

Person refers, generally, to any natural or legal person. For the purposes of this Policy, it does not matter whether the Person operates in the public or private sector.

Policy refers to this policy on preventing and combating corruption.

Public Official refers to a person who, permanently or temporarily, with or without remuneration:



- exercises duties and responsibilities established by law to fulfill the prerogatives of legislative, executive, or judicial power;
- holds a public office or dignity or exercises any public function;
- exercises, alone or with others, within an autonomous administration, another economic operator, or a legal entity with full or majority state capital, duties related to their object of activity.

Additionally, a Public Official is any person who performs a service of public interest for which they were appointed by public authorities or who is subject to their supervision or control regarding the performance of that public service. Moreover a Public Official is any public or elected official or officer, employee or person acting on behalf of Governmental Entity and any party official or candidate for political office or any person acting on behalf of such party official or candidate for political office. For the purposes of this policy, the notion of Public Official also includes government representatives, politicians, and political party representatives.

Receiving bribes refers to the act of a public official who, directly or indirectly, for themselves or another, demands or receives money or other undue benefits, or accepts the promise of such benefits, in connection with fulfilling, not fulfilling, expediting, or delaying the performance of an act within their official duties or performing an act contrary to their duties.

Relative refers to the spouse or life partner of an Employee or Contractor, as well as their children, adopted children, stepchildren, parents, siblings, and all other relatives by blood or marriage up to the fourth degree of kinship.

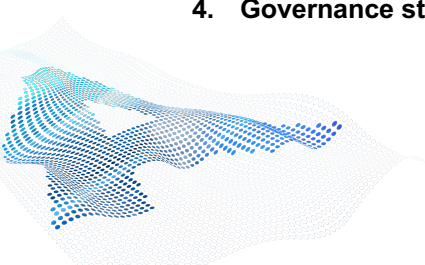
3. SMART Objectives

The Company is committed to maintaining the highest standards to integrity and preventing corruption in all business activities. To ensure effective implementation, the following SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) objectives are established:

- Zero incidents of corruption are reported annually across all business operations, with incidents monitored and investigated promptly.
- 100% completion of anti-corruption training by all employees and relevant third parties within the first quarter of each year and implement targeted control and mitigation measures for all high-risk employees within 30 (thirty) working days.
- Implement targeted control and mitigation measures for all high-risk business partners, with identified risks within 30 (thirty) working days.
- 100% compliance monitoring reports submitted annually to the Governance Body, outlining key compliance metrics, emerging risks, and recommendations for process improvement.
- Implementation of a transparent reporting mechanism, ensuring that all corruption-related concerns are acknowledged and assessed within 14 (fourteen) working days of submission.

These objectives shall be reviewed, monitored, and updated on a annual basis under the responsibility of the Compliance Officer, with reports presented to the Governance Body. Adjustments shall be made based on emerging risks, legal updates, and performance evaluations.

4. Governance structure and responsibilities



The Governance Body is a designated group within the Company responsible for overseeing and ensuring compliance with the Company's anti-corruption measures. This body plays a critical role in decision-making, monitoring, and enforcing anti-corruption policies. The Governance Body is formally appointed by the Board of Directors and is composed of individuals with relevant expertise in compliance, legal and business ethics. Membership is reviewed annually, and any changes must be documented and approved by the Board.

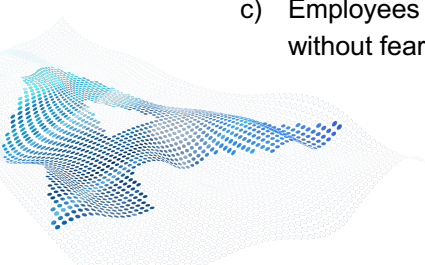
The Governance Body shall consist of 3 (three) members:

- a) **Chairperson** – that ensures strategic oversight, approves anti-corruption policies, and reviews compliance reports annually.
- b) **Member** – that provides expertise and recommendations on anti-corruption measures, participates in compliance evaluations, and supports risk assessment activities.
- c) **Compliance Officer** – is responsible for implementing and overseeing the company's anti-corruption framework. This role is essential in ensuring compliance with the anti-corruption policy and related regulations. The responsibilities of the Compliance Officer include but are not limited to:
 - i. ensuring that all employees and relevant third parties understand and comply with anti-corruption rules.
 - ii. organizing and ensuring 100% completion of annual anti-corruption training for employees and business partners.
 - iii. conducting compliance monitoring every 12 (twelve) months and submitting reports to the Governance Body.
 - iv. conducting annually risk assessments for high-risk business partners and employees in sensitive roles.
 - v. leading internal investigations on suspected corruption cases, documenting findings, and recommending corrective actions.
 - vi. ensuring disciplinary actions are taken for non-compliance, including potential contract termination or legal escalation.
 - vii. overseeing the implementation of whistleblower protection mechanisms and ensuring that reported concerns are addressed promptly.

These responsibilities shall be supplemented by those outlined in the Company's Whistleblowing Policy to ensure comprehensive oversight and protection of ethical standards.

All employees play a fundamental role in upholding the Company's commitment to anti-corruption compliance. Employees are expected to act with integrity, comply with all applicable laws and policies, and contribute to the prevention of corrupt practices within the organization. Their responsibilities include:

- a) Employees must comply with all anti-corruption procedures and report any suspected violations.
- b) Employees are required to complete annual anti-corruption training.
- c) Employees should use the anonymous reporting system to report any unethical or corrupt behavior without fear of retaliation.



Failure to comply with this policy may result in disciplinary action, including termination of employment, if the case.

5. Corrupt Practices

The Company has **zero tolerance** for any act of corruption (e.g., **giving** bribes, **taking** bribes, bribing public officials). Non-compliance with this policy can lead to sanctions and serious negative effects, both for the company and for the employees/ collaborators or the persons acting on behalf of the company.

Corruption includes **offering, giving, receiving, or soliciting** anything of value to improperly influence actions or decisions. Acts of corruption undermine trust, distort competition, and expose the company and individuals to severe penalties.

Examples of corrupt practices include bribery (direct or indirect), facilitation payments, kickbacks, and undue favors. For instance, paying a government official to expedite permits or secure a contract constitutes corruption. Such acts are strictly prohibited, regardless of intent or perceived benefit.

5.1. *How to determine if it is an act of corruption?*

If the answer to any of the below mentioned is **yes**, it is most likely to be an act of corruption:

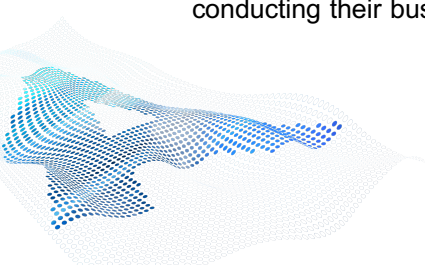
- i. are you required to pay something or provide any other benefit in addition to the cost of the services provided/ work performed, (e.g., an excessive commission, a bribe, or a contribution to a charity or political organization)?;
- ii. are you required to pay for services/ works to persons other than the service provider/ executor of the works?;
- iii. are the offers of hospitality or travel, personal favors, entertainments or gifts I give or receive unreasonable and unjustified?
- iv. would I be ashamed to disclose the receipt of benefits, gifts, personal favors or offers of hospitality?;
- v. when a payment or other benefit is offered or received, do I know or suspect that it is to induce or reward favorable treatment, to undermine an impartial decision-making process, or to persuade someone to do something that would be unusual in the proper performance of job duties?

5.2. *Agents, consultants, suppliers and business partners*

In compliance with applicable legal provisions, particularly those regarding the processing of personal data, the Company conducts investigations using public sources concerning individuals or entities with whom it plans to establish commercial relationships.

The Company will not engage in legal relationships with individuals publicly known to have been involved in acts of corruption, especially those with confirmed convictions, regardless of whether the sentence involves imprisonment. Additionally, the Company will refrain from engaging in legal relationships and will implement additional preventive measures regarding individuals who are reasonably known or suspected of involvement in acts of corruption.

The Company will establish commercial relationships only with individuals or entities that commit to conducting their business in full compliance with applicable legal provisions. Moreover, the Company will



immediately terminate any relationship if there are reasonable grounds to believe that the other party has engaged in acts of corruption.

Before establishing any commercial relationship with a third party, the Company is obligated to perform basic due diligence using public sources to determine whether that third party has been or is currently involved in corrupt practices.

5.3. *Donations and sponsorships*

Donations and sponsorships are accepted only if the Company does not receive and it is not perceived to receive any tangible consideration in return, except for image benefits associated with such actions. All donations and sponsorships will comply with applicable legal requirements.

Donations and sponsorships are not permitted during contract negotiations, except in cases where the sponsorship is explicitly included in the commercial agreement under negotiation.

Donations, as well as all events or initiatives supported through sponsorships, branding rights, or advertising costs, must adhere to the following principles:

- a) they must be requested in a fully transparent manner;
- b) they must comply with applicable laws;
- c) they must align with the Company's brand identity;
- d) they must be approved in accordance with internal standards;
- e) they must be accurately recorded in the company's accounting records; and
- f) they must be transparently documented in the form of a formal agreement or contract.

5.4. *Expenses, loans, facilitation payment and others*

Generally, all business-related expenses must be legitimate and necessary for the performance of duties also they need to be supported by original receipts or invoices and reasonable and proportionate to the business context

Prohibited practices for expenses include submitting claims for personal expenses, artificially splitting expenses to avoid approval thresholds or claiming excessive or luxury expenses without justification.

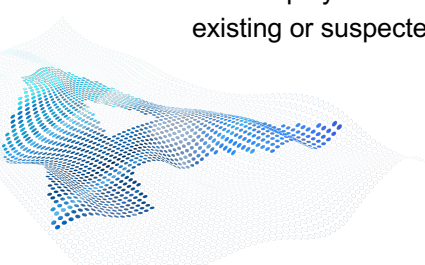
Paying for reasonable travel expenses for a consultant or business partner, where such payments are part of a legitimate contract and directly related to the performance of agreed services, is generally not considered corrupt.

Arctic Stream does not provide or accept personal loans or cash advances from or to customers, suppliers, government officials, or business partners under any circumstance.

Arctic Stream strictly prohibits all facilitation payments (accepting or offering), regardless of value or local practice. These payments are considered bribes and will trigger legal consequences beside contract termination.

5.5. *The notification of corruption acts*

The Employees/ Collaborators are encouraged to notify and to bring to the attention of the Company any existing or suspected acts of corruption.



The Designated Person is appointed by the decision of **the CEO, Dragos Diaconu**. If any of the Company's employees/ collaborators notice behaviors that could violate this Policy, or if they are approached to be asked to commit an act of corruption, the employees or collaborators will inform in writing, or through any channel made available by the Company.

The Designated Person will not reveal the whistleblower's identity, nor the information that would allow identification of such person, except of an obligation imposed by law. In this case, the whistleblower is informed prior to disclosure.

The Designated Person will send the whistleblower a confirmation of receipt of the report within no more than 7 (seven) calendar days from its receipt.

Employees are required to report any suspicion of corrupt behavior immediately through the **reporting mechanism**. Failure to report such incidents may be considered a violation of this policy. Consequences for engaging in or failing to report corrupt practices include disciplinary actions that may end up in termination of employment, and potential legal proceedings under Romanian Law no. 286/2009 (Penal Code).

6. Conflict of Interest

A conflict of interest arises when personal interests interfere with professional responsibilities, potentially compromising objectivity. Common situations include engaging in external business relationships that could influence decision-making, hiring relatives without disclosure, or holding financial stakes in a competitor or supplier.

Employees and Contractors must strive to avoid conflicts of interest. However, when avoiding a conflict is not feasible, it is essential for both the Company and the individual involved to promptly disclose the situation. Early identification, analysis, and management of a potential conflict can mitigate risks before any harm occurs.

Employees or Contractors who suspect or become aware of an actual or imminent conflict of interest must immediately report it to the Company's management to facilitate corrective actions. Managers and supervisors are responsible for monitoring potential conflicts among their team members and addressing them appropriately.

The Company ensures that all conflicts of interest are handled fairly and transparently. Each case is addressed individually, balancing the integrity and reputation of the Company with the rights and interests of the individual involved. Depending on the potential impact, the Company will seek solutions that minimize risks to the business while protecting the employee or contractor's interests, where possible.

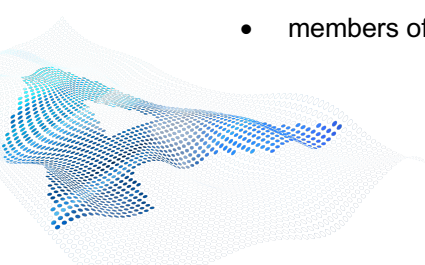
Intentional concealment of a conflict of interest or failure to disclose it may result in disciplinary action, including termination of employment or collaboration agreements.

6.1. Reporting obligations

The Company encourages Employees and Contractors to report any concerns or request guidance regarding potential conflicts of interest. Individuals suspecting or identifying situations that contradict this policy are obligated to notify the Company promptly.

The following individuals are required to complete a Conflict-of-Interest Declaration (Annex 1):

- members of the Board of Directors or other governance bodies of the Company.



- Employees involved in managing supplier relationships, including procurement, tenders, partnerships, and sponsorships, as well as their supervisors.
- individuals handling sales projects, including presales and technical team
- Current or prospective employees taking on the roles listed above at the time of signing their employment contracts.

The Conflict-of-Interest Declaration must detail any personal, professional, financial, or familial relationships that may relate to the individual's position within the Company. This includes:

- roles or affiliations with organizations (e.g., as a shareholder, administrator, or employee).
- the occupations and employers of the individual's spouse and adult children.
- public offices held.
- any direct or indirect connections to suppliers, commercial partners, or public institutions relevant to the Company's operations.

Declarations will be completed and signed annually by **30.03** of the year and will be reviewed in compliance with applicable data protection laws. Compliance Officer ensures timely completion and proper documentation of all declarations.

6.2. *Managing Conflicts of Interest*

If a conflict of interest arises, whether actual, potential, or perceived, it is analyzed by the designated responsible person, involving departmental managers as necessary. Decisions are made in accordance with applicable laws, the individual's rights, and the Company's internal policies.

Key factors considered include:

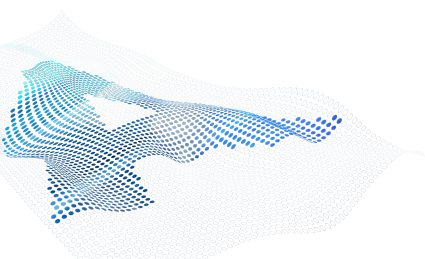
- the nature of the situation (e.g., isolated incident or recurring structural issue).
- the type of interests involved (e.g., personal, familial, or financial connections).
- the potential impact on the Company (e.g., reputational risk, operational disruption).
- the context surrounding the individual's involvement (e.g., external pressures or likelihood of coercion).

Depending on the circumstances, measures may include:

- requiring the individual to abstain from activities or decisions related to the conflict.
- supervising or reviewing the individual's actions by a manager or third party.
- temporarily or permanently modifying procedures, such as restricting access to information or excluding the individual from certain meetings.
- adjusting the individual's responsibilities or role within the Company.

The situation is monitored until fully resolved.

6.3. *Consequences of Non-Disclosure*



Failure to disclose a conflict of interest in a timely and appropriate manner can disrupt the Company's operations and result in sanctions in line with applicable laws.

For instance, an employee or contractor working for a competitor or supplier constitutes a breach of loyalty to the Company. Similarly, concealing a conflict - such as holding undisclosed interests in a supplier through an intermediary - violates this policy.

To address such issues, the Company, through its authorized departments (e.g., Human Resources), may conduct investigations upon receiving an alert or identifying a potential conflict. All actions will strictly comply with applicable laws, including data protection regulations (e.g., GDPR), and the Company's internal rules, ensuring the protection of individual rights.

7. Gifts, Entertainment, Travel, Personal favours and Hospitality

While small gestures may be appropriate in fostering professional relationships, gifts, entertainment, travel, hospitality and personal favors can create perceptions of impropriety or undue influence. To ensure transparency:

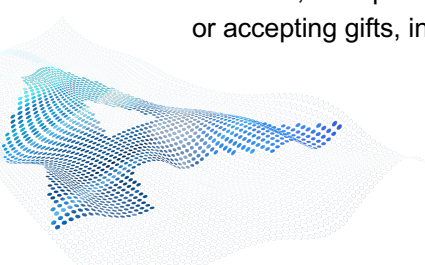
- Gifts must be modest, with a maximum value of 500 RON (approximately €100). Gifts exceeding this threshold must be pre-approved by the Compliance Officer. Monetary gifts, gift cards, or equivalents are strictly prohibited under any circumstances.
- Entertainment, hospitality, travel and personal favors must serve a legitimate business purpose, such as building professional relationships or discussing specific projects. Lavish or excessive entertainment, as well as expenses unrelated to business, are prohibited. For example, hosting a dinner to discuss a joint project is acceptable, but inviting partners on an all-expenses-paid luxury vacation is not.
- Any interaction with government officials involving gifts, hospitality, travel or entertainment requires prior written approval from the Compliance Officer, as Romanian law and international standards impose stricter scrutiny on these interactions. Neither Arctic Stream nor its employees will pay any expenses for travel, lodging, gifts, hospitality, entertainment or charitable contributions for government officials on Cisco's behalf.

Employees must document all gifts, entertainment, hospitality travel and personal favors above 500 RON (approximately €100) in the company's Gift and Hospitality Register via email at gifts@arcticstream.ro. Periodic audits will be conducted to ensure compliance. Violations of these rules may lead to disciplinary action and potential legal consequences.

The Company strictly prohibits its Employees and Contractors from:

- Demanding or soliciting gifts or hospitality gestures;
- Offering, soliciting or receiving community benefits or club memberships;
- Giving or accepting money or monetary equivalents (e.g., gift cards);
- Giving or accepting gifts or hospitality during negotiations or in the context of ongoing or imminent bidding procedures with a supplier or client.

Gifts or hospitality gestures may be **offered** or **accepted** only if they are reasonable, appropriate to the occasion, transparent, rare, and solely intended to build business relationships. If in doubt, avoid offering or accepting gifts, invitations, or hospitality gestures, or return any received gifts to the sender.



It is essential that gifts or hospitality do not influence business decision-making processes or create the appearance of such influence. For this reason, employees involved in key decision-making processes with suppliers—such as those in procurement or vendor management departments—must generally refuse or return all gifts, except for low-value items, marketing materials, or minor tokens such as chocolates.

Frequent or repetitive gifts and hospitality gestures are prohibited, regardless of their value. Additionally, personally paying for gifts or hospitality to avoid disclosure or recording in the Company's systems is strictly forbidden.

While the giving or receiving of gifts and hospitality is often an important part of maintaining and developing business relationships, all such gestures must serve a legitimate, reasonable purpose, occur in the normal course of business, and comply with the Company's policies, as updated periodically. Gifts, travel, hospitality, or invitations to events typically include offering or receiving gifts, meals, or other tokens of gratitude or appreciation, or invitations to social events related to the Company's business activities. Such activities are permitted only if they remain within reasonable limits in terms of value and frequency.

Confidential and privileged information must be strictly protected from unauthorized use or disclosure, must not be misused for personal gain or to benefit others, and should only be shared internally on a need-to-know basis or externally when legally required, in full compliance with anti-bribery policies and procedures.

7.1. Guidelines for giving or accepting gifts, travel, hospitality or personal favors:

The giving or receiving of gifts (gifts, travel, hospitality or personal favors) is generally permissible if:

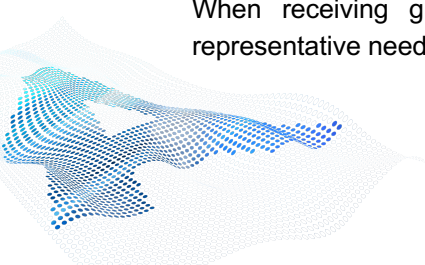
- g) It is not intended to influence a person to secure or maintain an advantage that conflicts with the Company's interests or to grant favors or benefits to the Company in violation of the law;
- h) It does not involve money or monetary equivalents (e.g., vouchers, gift cards);
- i) It complies with the law;
- j) It is appropriate to the specific circumstances;
- k) It is offered publicly and not in secret;
- l) It is given in the Company's name, not personally;
- m) It does not involve a Public Official.

The Company does not accept money, gifts, hospitality, travel, personal favors or other advantages from any individual or entity with whom it conducts business, or from anyone associated with them, to influence employees or contractors to act contrary to their contractual obligations or job descriptions. Any individual aware of such circumstances must immediately notify the Company in writing.

Travel is allowed as long as is not intended to influence a business decision or gain an unfair advantage, it has a clear business purpose, the agenda and participants are known and documented and the expenses are reasonable. All travel is subject to prior approval from the direct management and it will generally be allowed for participation in technical workshops, new product training or increase the technical skills.

7.2. Steps for employees, contractors, or representatives receiving gifts or invitations:

When receiving gifts (above 500 RON) or invitations, each employee/ contractor/ collaborator/ representative needs to evaluate and address them responsibly to ensure compliance with the Company's



anti-corruption policy and maintain the integrity of business relationships. Employees, contractors, or representatives must adhere to the following steps to ensure transparency and prevent any potential conflict of interest or perception of impropriety:

a. Assess the intent and perception of the gift or invitation

Before accepting, carefully evaluate whether the gift or invitation could be interpreted as an attempt to influence a business decision. It is critical to ensure that accepting the gesture would not compromise the recipient's objectivity or create an impression of favoritism or impropriety.

b. Verify the absence of a conflict of interest

Confirm that the gift or invitation does not present a conflict of interest, either actual or perceived. A conflict of interest arises when the gesture could influence or appear to influence decisions in favor of the party offering it, to the detriment of the Company's interests or impartiality.

c. Consider third-party policies and regulations

Take into account any internal procedures or external regulations applicable to the third party offering the gift or invitation. If these guidelines are public or have been communicated, ensure the gesture complies with them and cannot reasonably be construed as a bribe or an improper benefit.

d. Notify a direct supervisor

Upon receipt of a gift or invitation, promptly inform your direct supervisor via email. This notification must occur as soon as possible and no later than 24 hours after receiving the gift or invitation. Transparency in this step ensures accountability and compliance with the Company's policies.

e. Record in the gift (via email to etica@arcticstream.ro)

This record must be completed immediately upon receipt or, at the latest, within 24 hours. Maintaining this record is a crucial step in fostering transparency and facilitating internal reviews.

f. Return impermissible gifts or invitations

If a gift or invitation violates the Company's policy (e.g., exceeding value thresholds or being offered in inappropriate circumstances), it must be returned to the sender immediately, within 24 hours. When returning such items, include the following standardized message:

"Dear Partner,

We confirm receipt of your gift [...] and thank you for your kind gesture of courtesy.

Please note that our relationships with all partners are based on professionalism and trust. In line with our values, principles, and vision, we are unable to accept gifts from partners with whom we conduct business. Accordingly, we are returning the gift received.

We kindly ask that you consider the above in the future.

With kind regards,

[Your Name]"

g. Special considerations for flowers



If flowers are received, they do not need to be returned. However, the recipient must still send the above standard message to acknowledge the gesture and ensure the sender is aware of the Company's policy.

h. Exemption for Promotional Items

The requirements to notify a supervisor, document the gift, and return it do not apply to promotional items (e.g., branded merchandise or marketing materials). These items are acceptable provided they comply fully with the Company's policy, remain of nominal value, and are appropriate for the business context.

By adhering to these steps, the Company ensures that all interactions involving gifts or invitations remain professional, transparent, and aligned with ethical and legal standards.

8. Controls and Procedures

To mitigate risks of corruption, Arctic Stream implements robust controls across financial and non-financial processes:

- All transactions must be recorded accurately and supported by appropriate documentation. For example, payments to suppliers must be backed by verified invoices and detailed service descriptions. Unrecorded or "off-book" transactions are strictly prohibited under Romanian accounting and anti-corruption laws.
- Multi-tiered approval systems are required for high-value transactions, ensuring oversight and preventing unauthorized payments.
- All third-party engagements, including contractors and suppliers, must undergo due diligence to verify their compliance with anti-corruption standards.

Non-financial controls include regular training for employees, clear guidelines for contract evaluations, and oversight mechanisms for high-risk activities, such as dealings with politically exposed persons (PEPs).

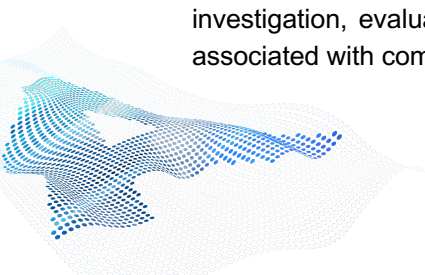
9. Risk Assessment

Elements of incident risk with possible acts of corruption: the risk of possible inappropriate interactions of the Company's representatives (at all levels) with the civil servants; the risk presented by the interaction with associates, agents, and suppliers; the risk regarding donations, charitable activities and hospitality; the risk of inadequate employment and remuneration (for reasons ranging from possible corruption, bribery or nepotism); the risk associated with the acquisition or outsourcing of contracted consulting services.

Arctic Stream performs all reasonable and possible diligences to assess and avoid potential negative exposure to all parties to a business partnership, including employees, supplier network, agents, intermediaries and other partners.

9.1. Business Partners risk assessment procedure

The Company conducts due diligence on all business partners before establishing a relationship. This process may involve the collection of information and analysis, usually carried out by gathering documents, interviews and financial analysis. More detailed risk assessments also may involve verifying the business operations that can be performed at the corporate level and in high-risk locations. The research, investigation, evaluation and monitoring will be performed in business relationships to ensure that it is associated with companies and staff who will act in a manner consistent with its policies and values.



The result of the risk assessment will be composed from an internal due diligence process that includes but is not limited to following criteria:

- type of business/partnership
- type of transaction
- value and frequency of doing business with the respective partner
- history of working relationship
- public records checks

and a questionnaire filled in by the business partner which takes into consideration:

- size and organization structure
- existing of anti-bribery certification
- regular anti-bribery trainings
- government affiliations

While we can't enforce the completion of the questionnaire by our business partners we high encourage it cause the lack of response increase the risk level.

The partners are then categorized into risk levels:

- **low risk** – no previous compliance violations; standard monitoring applies.
- **medium risk** – minor compliance concerns;
- **high risk** – history of regulatory breaches or weak internal controls;

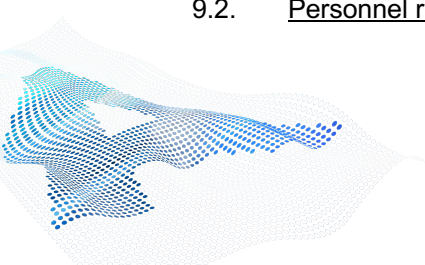
Medium risk business associates control and mitigation measures:

- follow-up for KYBP questionnaire completion
- regular reviews and monitoring by the compliance office (biannually)
- additional contractual safeguards on data protection and compliance
- suggest implementation of anti-corruption policies and procedures
- develop contingency actions for potential breaches

High-risk business associates control and mitigation measures:

- business conditioned by business case and senior management approval
- enforce strict contractual clauses with possible penalties for non-compliance.
- regular reviews and monitoring by the compliance office (quarterly)
- engage legal team for ongoing oversight and review
- suggest implementation of anti-corruption policies and procedures
- provide targeted webinar on anti-corruption policies and procedures
- renegotiation of terms
- possible termination of the contract

9.2. Personnel risk assessment procedure



Employees risk assessment procedure includes multiple layers of evaluations including:

- conflict of interests
- job role and seniority and links to internal parties
- authority provided in the job description of the role
- public records

The result of the risk assessment will be composed from an internal due diligence process that will take into consideration job role, seniority, risk level of the business associate he/she is working with, authority provided in the job together with a self-completed conflict of interests questionnaire.

The conflict of interests may occur in the situation where the Company representative or employee:

- is part of a contract with the Company other than the employment or mandate contract without informing the management of the company;
- collaborates in personal interests with the Company's business partners: customers, suppliers; commits at the same time or collaborates in personal interest directly or through agents, in the field in which Arctic Stream operates;
- borrows from or lends money to persons, organizations with which the Company has business ties, except for bank loans;
- offers consultancy the third parties in the field in which he/she works for the Company in personal interest and without the authorization of the Company's management;
- coordinate directly, or indirectly, a family member;
- in sensitive roles, such as procurement, finance, or government relations(sales) that have close direct personal relationships
- has the material interest in a person who is a party to one of the above situations;
- carries out economic activities through which it competes with the activities provided by Arctic Stream;
- works for a competing company or holds the position of director or consultant for such a company;
- invests in a competing company unless it invests in a company listed on a stock exchange.

Employees in sensitive roles, such as procurement, finance, or government relations (sales), undergo pre-employment screenings and periodic reassessments. Employees are classified as:

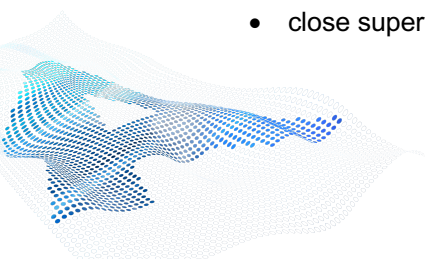
- **low risk** – no exposure to corruption risks; standard compliance training applies.
- **medium risk** – some decision-making authority over contracts or finances;

Control and mitigation measures

- additional compliance oversight
- targeted anti-corruption training
- restricted access to sensitive financial and decision-making processes
- **high risk** – Direct involvement in financial transactions or regulatory dealings;

Control and mitigation measures

- close supervision



- subject to intensive training
- Include adherence to anti-corruption policies and trainings as a key performance indicator
- limit their authority over sensitive transactions and approvals
- mandate counter-signatures for purchases above certain thresholds
- regular audits focusing on financial transactions, contract approvals, and employee expense claims

Employees must disclose any potential conflicts of interest, as per art. 5.4. above, including undisclosed business relationships, financial dealings with company partners, or concurrent employment in a competing business. Those in conflict must recuse themselves from decision-making processes related to the matter. If an employee is found to be in violation, appropriate disciplinary measures, including reassignment, increased oversight, or termination, will be taken.

The Company documents the results of all risk assessments in an internal report, highlighting key risks and necessary remediation strategies. These assessments are reviewed annually and adjusted as necessary to address emerging threats and regulatory changes.

10. Consequences of Non-Compliance

Non-compliance with this policy exposes employees and the company to severe consequences, including:

- Internal disciplinary measures, ranging from written warnings to termination of employment.
- Civil and criminal penalties under Romanian Law no. 78/2000 and the Penal Code, which may include fines, imprisonment, and disqualification from holding certain positions.
- Reputational damage, affecting relationships with clients, partners, and regulatory bodies.

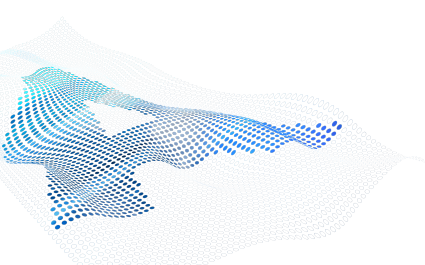
As regards whistleblowers, the provisions of the Whistleblowing Policy shall apply. The Company strictly prohibits any form of retaliation against whistleblowers who report corruption or unethical practices in good faith. Whistleblowers shall be protected from dismissal, demotion, harassment, or any other discriminatory treatment as a consequence of making a report. The identity of the whistleblower shall be kept confidential unless disclosure is required by law. Any employee or manager found retaliating against a whistleblower will face disciplinary measures, including possible termination of employment. The Compliance Officer is responsible for ensuring that whistleblower protection mechanisms are effectively enforced and monitored.

11. Investigation and dealing with corruption

The Company adheres to a structured and transparent process for investigating corruption allegations, ensuring that all reported concerns are handled fairly, consistently, and in accordance with legal and ethical standards.

Upon receiving a report, the Compliance Officer assesses its credibility and assigns a priority level based on factors such as *severity*, *potential legal implications*, and *risk to the organization*. A preliminary review is conducted to determine whether a full investigation is warranted. If the claim requires further examination, an investigation team composed of compliance, legal, and finance representatives is appointed to conduct an in-depth inquiry.

The investigation follows a defined set of steps:



- a) initial review and classification. The Compliance Officer reviews the reported incident, categorizes it based on its severity (low, medium, or high risk), and determines the necessary level of response.
- b) evidence collection and documentation. Investigators gather all relevant records, including financial statements, emails, contracts, and internal communications. If necessary, forensic accounting techniques are applied to detect any irregularities in financial transactions.
- c) interviews with key stakeholders. Employees, managers, or third parties involved in the case are interviewed to obtain statements and assess their level of involvement. All interviews are documented to ensure accountability.
- d) regulatory and legal assessment. The legal team assesses whether the findings violate internal policies, local anti-corruption laws, or international compliance frameworks. If a legal violation is confirmed, appropriate external legal consultation is sought.
- e) findings and report preparation. All evidence is analyzed, and a comprehensive report is prepared, detailing the nature of the incident, individuals involved, evidence gathered, and an evaluation of the impact on the organization.
- f) reporting to Cisco. If there is a confirmed case that is in any way related to Cisco, Cisco deals or Cisco's business the case will immediately reported via one of the following methods :
 - Online : [EthicsWebForm](#) for anonymous reporting
 - Phone: [Ethics Line](#) available 24hours/7 days a week, toll-freee phone numbers.
- g) decision and implementation of corrective actions. The Governance Body reviews the investigation report and determines appropriate measures, which may include disciplinary actions such as written warnings, suspension, termination of employment, or contract termination with external parties. If legal violations are found, cases may be referred to law enforcement authorities.
- h) follow-up and monitoring. The Compliance Officer ensures that corrective actions are implemented, tracks the effectiveness of remedial measures, and follows up to prevent recurrence.

Practical examples of corrective actions include increased monitoring of financial transactions in high-risk departments, revising procurement policies to introduce stricter controls, and mandatory retraining for employees involved in the incident. If a supplier is found to have engaged in corrupt practices, their contract may be immediately terminated, and a blacklist policy may be enforced to prevent future engagements.

To ensure continuous improvement, all cases are reviewed annually, or any time the situation requires in compliance meetings to assess trends, recurring issues, and potential gaps in the anti-corruption framework. In case there is any detection of a corrupt act/practice the Company policy (Anti Corruption Policy) will be reviewed in order to be changed and include any additional measures to avoid a future similar case/s. Additionally the corruption risk assessment processes either for employees, business partners or both will be reevaluated in order to prevent any such happening again.

12. Training and Awareness

To ensure effective implementation, all employees must complete annual training on anti-corruption practices, with a focus on recognizing risks and adhering to company guidelines.

13. Monitoring and Review

This policy is reviewed annually by the Compliance Department to ensure it reflects the latest legal and regulatory changes. Evidence of the review process, including updated policies and corrective actions, will be documented and communicated to employees.

Employees are encouraged to report concerns or violations confidentially via whistleblowing channel, where all reports are investigated impartially and without retaliation.

This policy reflects Arctic Stream's commitment to fostering an ethical workplace, free from corruption and aligned with Romanian legal standards. For further guidance or clarification, employees are encouraged to contact the Compliance Officer.

