



# KSAT Policy for Anti- corruption

## 1. KSAT Anti-corruption policy

*Corruption represents a major threat to rule of law and sustainable development the world over. It has a disproportionate, destructive impact on the poor and most vulnerable, but it is also quite simply bad for business.<sup>1</sup>*

At KSAT there is zero tolerance for corruption and acts and reacts promptly when/if corruption occurs. KSAT maintains constant focus on prevention, risk reduction measures and detect corruption through compliance procedures.

KSAT defines corruption as the *abuse of power for private gain. This involves both financial and non-financial benefits.*

Corruption undermines legitimate business activities, distorts competition, ruins reputations and exposes companies and individuals to risk. KSAT is opposed to all forms of corruption, irrespective of which country we operate in, and will adhere to legal requirements established by Norwegian law, as well as other relevant local and international anti-corruption legislation.

### **KSAT employees, and representatives, shall always consider the following:**

- Could the activity involve any risk for corruption?
- Is it within the law and comfortably within KSAT's own ethical requirements?
- Are the current activities transparent on both KSAT side and the other parties' side?
- How will the activities appear if they became public or known to law enforcement authorities?

### **Gifts and hospitality**

KSAT encourage our employees to build and maintain relationships with our Business Partners through networking and social interaction, and at the same time always be aware of relevant legislation and our internal rules for gifts and hospitality.

Networking and social activity shall be business-related, reasonable and justifiable, and not lavish nor excessive, and never exercised to an extent that can be perceived as bribery or

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<sup>1</sup> UN: An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide

corruption, or raise question about potentially being a violation of the antitrust laws.

Gifts and hospitality shall always be made in a transparent way. Giving and accepting gifts or hospitality that could affect business decisions shall be avoided. Special care shall be exercised during negotiations, decision-making processes, bids, tenders and similar situations.

KSAT encourage giving promotional items bearing KSAT name or logo.

### **Sponsorship, Political and Charitable Contributions**

Special caution shall be taken when assessing sponsorships and charitable contributions due to the potential for appearance of impropriety and any risk of corruption. Political contributions are not provided.

### **Lobbying and Political Expenses**

All lobbying firms, as well as any KSAT employees who are authorized to engage in lobbying activities on behalf of the company, must be duly registered as such and are expected to comply with all lobbying regulations under local law, including written disclosure requirements.