



ANTI BRIBERY POLICY

1. Introduction

1.1 Purpose

At EPIC, we do not bribe anyone. This Policy sets forth the respective principles and rules on EPIC's anti-bribery practices and how they must be implemented.

1.2 Scope and Applicability

This Policy applies to all employees of EPIC.

EPIC seeks to engage with subcontractors, advisors or other parties within its supply chain who comply with the applicable anti-bribery laws, rules and regulations or who provide an anti-bribery standard aligned with this Policy.

2. Principles and Rules

2.1 Basic Rules

Principles and Rules

Employees must not bribe and they must not use intermediaries, such as agents, consultants, advisers, distributors or any other business partners to commit acts of bribery.

EPIC does not distinguish between public officials and private persons so far as bribery is concerned: bribery is not tolerated, regardless of the status of the recipient.

Always ask yourself before offering, giving, or promising anything of value to any person if what you are considering could be viewed as having an illegitimate purpose. If the answer is yes, you must not proceed.

If you are in any doubt, you have a duty to consult the CEO / CFO of EPIC for clarification before proceeding.

Definitions

Bribery means offering, giving or promising (or authorizing someone to offer, give, or promise) an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behaviour of someone to obtain or retain a commercial advantage.

Bribery can take a variety of forms – offering or giving money or anything else of value. In fact, even common business practices or social activities, such as the provision of gifts and hospitality, can constitute bribes in some circumstances.

Situations when employees receive, agree to receive, request or accept a financial benefit or anything else of value are regulated in 2.2.

2.2 Gifts, Hospitality, and Entertainment

Principles and Rules

Gifts, hospitality, and entertainment must be modest, reasonable and infrequent so far as any individual recipient is concerned.

Gifts, hospitality, and entertainment must never be promised, offered, or provided with the intent of causing the recipient to do something favouring EPIC, to reward such behaviour, or to refrain from doing something disadvantaging EPIC.

Do not provide or pay for entertainment to any participant to EPIC business meetings, congresses or comparable events, unless the entertainment is an appropriate and incidental part of such events. Do not pay for any side or extended trips.

Offering or accepting reasonable and proportionate gifts and hospitality constitutes accepted practice and is exempt from the prohibition of bribery and corruption according to the Swiss Criminal Code. However, certain gifts and instances of hospitality may be perceived as excessive or otherwise improper.

The basic question to ask is: "Is the gift or hospitality:

- a. proportionate, reasonable and not unduly extravagant given the circumstances;
- b. offered without any illegal intention; and
- c. not suitable to induce the receiving party to act in an improper way or to use his/her discretion in a certain way?"

If the answer is "Yes" to all parts of the above questions, such gift or hospitality is unlikely to breach anti-bribery and anti-corruption laws.

If the answer to any part is "No", the partner or employee should not offer or accept the gift or hospitality.

In any case, offering or accepting gifts of more than 150 CHF / 100 EUR or entertaining exceeding 600 CHF / 400 EUR per person for a single occasion is not allowed and are to be reported in a timely manner to the CEO / CFO of EPIC.

On an exceptional basis, the Chairman of the Board can approve the offering of entertaining abroad to Non-Public Officials up to a limit of 2'000 CHF / 1'300 EUR per person per single occasion as long as the entertainment is restricted to no more than one such event with this person every second year.

Offering gifts of more than 45 CHF / 30 EUR or entertaining exceeding 450 CHF / 300 EUR per person for a single occasion to Public Officials (see 2.4) is not allowed and are to be reported in a timely manner to the CEO / CFO of EPIC.

Any gifts and entertainment offered / accepted by an EPIC employee of above 50 CHF respectively 200 CHF per person are to be reported in a timely manner to the CEO / CFO of EPIC. (Individual / Company name / Amount if known / Date / Type / Short description if needed).

Definitions

Gifts are benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return. They include 'courtesy gifts', which are small gifts given at culturally recognized occasions (e.g., weddings, funerals) or special times of the year (e.g., Christmas, New Year).



Hospitality generally includes refreshments, meals, and accommodation.

Entertainment generally includes attendance at plays, concerts, and sport events.

Type of conflict	What must be avoided or removed
Gifts, meals, travel, entertainment	<p>Employees must not directly or indirectly solicit or accept from any EPIC business partner or competitor</p> <ul style="list-style-type: none"> • Cash or cash equivalents (e.g., stocks, gift certificates, discounts not based on a collective agreement, etc.); this includes actual and potential business partners or competitors • Gifts; notwithstanding the rule laid out above, if a gift is received nonetheless, it must be returned if it influences or could be perceived as influencing the employee's business judgment • Meals, travel, or entertainment, unless it predominantly meets an EPIC business purpose, is accompanied by a representative of the business providing it, and does not influence (and cannot be perceived as influencing) the employee's business judgment. <p>Accepting entertainment of a non-ordinary, exceptional nature requires the approval of the CEO / CFO of EPIC</p>
Fees, commissions, services, other favours	<p>Employees must not directly or indirectly</p> <ul style="list-style-type: none"> • Solicit or receive a fee, commission, service, or other favour from any actual or potential EPIC business partner or competitor

Cash and gifts that are cash equivalent (e.g., shopping coupons) must never be given.

Employees are not allowed to donate to charities on behalf of EPIC without approval of the CEO / CFO of EPIC.

2.3 Rules Relating to Public Officials

Principles and Rules

EPIC does not distinguish between public officials and employees of private sector organizations so far as bribery is concerned; however, it is important to recognize that public officials are often subject to rules and restrictions that do not apply to persons who operate in the private sector.

Any relationship with public officials must be in strict compliance with the rules and regulations to which they are subject (i.e., any applicable rules or regulations in the particular country relating to public officials or that have been imposed by their employer) and any benefit conveyed to a public official must be fully transparent, properly documented, and accounted for.

Definitions

The term 'public official' has been extensively interpreted by regulators and includes

- Any elected or appointed officer or employee of a government or government department, government agency, or of a company owned or partially owned by a government
- Any elected or appointed officers or employees of public international organizations, such as the United Nations
- Any person acting in an official capacity for or on behalf of a government or a government department, government agency, or of a public international organization
- Politicians and candidates for a political office
- Any other person who is considered to be a public official according to applicable laws, regulations and industry codes

2.4 Lobbying

Principles and Rules

To a limited extent, EPIC engages in lobbying activities to provide policy makers with data and insights to enable widely informed decision-making conducive to providing the best available real estate solution for the community in question.

Lobbying should not be misused for any corrupt or illegal purposes, or to improperly influence any decision. Lobbying should be conducted based on the values of transparency, honesty and integrity.

Employees are not allowed to donate to political parties or organisation on behalf of EPIC without approval of the CEO / CFO of EPIC.

Definitions

'Lobbying' describes interactions with policy makers and other external stakeholders with the intent to represent EPIC's perspective in the decision-making process. Active contribution to policy making is an integral part of the democratic process and a legitimate activity as it enables the representation of different societal interests.

2.5 Facilitation Payments

Principles and Rules

EPIC prohibits facilitation payments, irrespective of whether local law permits facilitation payments.

Definitions

Facilitation payments are payments to public officials to expedite the performance of duties of a non-discretionary nature. These payments are intended to influence only the timing of the public officials' actions (e.g., payments to expedite the issuance of a visa or clearing goods through customs), but not their outcome.

2.6 Third Parties

Principles and Rules

EPIC must only engage Third Parties if all of the following requirements are met:



- There is a legitimate need for the services or the goods that they provide
- The services and goods are priced at no more than market value
- The Third Party is suitable from an anti-bribery perspective
- There is a written contract or other written document with a similar legal effect (e.g., Purchase Order)

The receipt of services or goods must be documented and in line with the requirements stipulated in Section 2.9 of this Policy.

Engagement of Third Parties – including advisors – must never be used to create an incentive, or to reward or to secure any improper business advantage for EPIC.

Definitions

A Third Party is any natural person or legal entity with whom EPIC interacts and who poses, due to the nature of their business, a particular level of bribery risk. EPIC affiliates are not considered Third Parties in this Policy.

2.7 Books and Records/Internal Controls

Principles and Rules

EPIC must prepare and maintain books and records that accurately and in reasonable detail document the source and use of EPIC revenues and assets.

'Off-the-books' accounts and false or deceptive entries in EPIC books and records are strictly prohibited.

All financial transactions must be documented, regularly reviewed and properly accounted for in the books and records of the relevant EPIC entity.

All relevant financial controls and approval procedures must be followed.

The retention and archive of EPIC records must be consistent with EPIC standards and tax and other applicable laws and regulations.

Definitions

Books and records include accounts, invoices, correspondence, papers, CDs, tapes, memoranda and any other document or transcribed information of any type.

3. Implementation

3.1 Training

Employees must familiarize themselves with this Policy and confirm that they understand their duties and responsibilities according to this Policy.

3.2 Reporting Potential Misconduct/Non-Retaliation

Any employee who learns of a potential violation of applicable laws or this Policy is required to report his or her suspicion promptly to the CEO / CFO of EPIC.

Employees who, based on good faith, report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliation.

3.3 Breach of this Policy

Breaches of this Policy will not be tolerated and can lead to disciplinary and other actions up to and including termination of employment.

3.4 Exceptions

No exceptions can be granted from compliance with applicable laws, regulations and industry codes.

3.5 Responsibilities and Implementation

All employees are responsible for adhering to the principles and rules set out in this Policy.

3.6 Validity

This document is valid from 31 January 2021.

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