



Anti-corruption Policy

1.0 Purpose

This policy sets forth ARD GENERATOR's prohibition against bribery. As agent of Volvo Group products and services, we must follow all applicable laws in every country in which we operate.

2.0 Scope

This policy applies to the employees of ARD GENERATOR's entities worldwide, including subsidiaries, joint ventures, affiliated companies, distributors and dealers.

3.0 Policy

ARD GENERATOR competes on a commercial basis and will not act unethically or illegally to obtain or retain business anywhere in the world. ARD GENERATOR prohibits all bribery in the course of doing business. Our employees must do nothing in the search of business that they would not reveal willingly to any other member of ARD GENERATOR, any government regulator, or the public. No employee of ARD GENERATOR, or a third party acting on ARD GENERATOR's behalf, may offer, promise, authorize, or transfer any payment, gift of any kind, or anything of value to any government official or any other person or entity including those in the private or commercial sector, where the purpose is to improperly induce the recipient to take (or refrain from taking) action that would provide a commercial advantage to ARD GENERATOR or its related entities. Bribery can include not just the payment of money, but the transfer of anything of value including lavish entertainment or travel expenses, a future job offers, or political or charitable donations.

3.1 Payments to Non-Government Officials

ARD GENERATOR prohibits all acts of bribery. This includes how we deal with government officials and also how we interact with individuals in the commercial and private sectors. The casual exchange of business courtesies (e.g. meals, entertainment, and nominal gifts) is a widespread commercial custom. The integrity of ARD GENERATOR requires that such exchanges remain casual and token. When receiving or offering any payment, gift of any kind, or anything of value (meals, entertainment, etc.) to third parties, employees must avoid any action which might distort, or might appear to distort, the strictly commercial nature of any business dealings. Special considerations for transactions involving government officials are outlined in the remainder of this policy.

3.2 Laws Regarding Bribery and Payments to Government Officials

Most countries have laws prohibiting bribery of government officials. Anti-bribery laws and ARD GENERATOR's policy prohibit:

- Paying or offering to pay anything of value;
- To a government official, or to any other person while knowing or having reason to know that all or part of the thing of value will be paid or offered to a government official;
- For the purpose of influencing the official in some official act or to secure any improper advantage



3.2.1 Who is a “Government Official”?

“Government Official” is broadly defined to include:

- Any elected or appointed government official (including low-level clerical employees);
- Any political party, officer, employee or candidate for public office;
- Officials or employees of public international organizations (e.g. the United Nations, World Bank, etc.);
- Members of royal families;
- Employees of state-owned enterprises; and
- Relatives or affiliates of those listed above.

3.2.2 What is “Anything of Value?”

The definition of bribery is not limited to cash payments. This policy covers giving or receiving any item of value. Items of value include, but are not limited to:

- Cash
- Cash equivalents (gift certificates, gift cards, vouchers, etc.)
- Gifts
- Travel
- Accommodations
- Meals
- Entertainment (such as sporting events or golf outings)
- Loans
- Use of vehicles
- Valuable favours (such as educational or employment opportunities)

3.3 Payments Involving Government Officials

Anti-bribery laws and regulations, and the stipulations in this policy are designed to combat corruption and prevent companies from obtaining an unfair commercial advantage. Certain transactions involving government officials may be allowed depending on the type of transaction, its intended purpose, and the applicable laws and regulations governing the situation. The determination of whether a transaction constitutes a bribe or is ethically and legally acceptable depends on a complex set of factors and should not be made alone.

3.4 Company Responsibility for Actions of Third Parties

Anti-bribery laws hold ARD GENERATOR responsible for any illegal actions engaged in by agents of ARD GENERATOR, including consultants, brokers, distributors or dealers. Consequently, it is ARD GENERATOR’s policy to require third parties who act on ARD GENERATOR’s behalf to comply with this policy and all applicable anti-bribery laws. In order to manage the risk associated with third parties who may interact with government officials, the following actions must be taken:

- Prior to establishing a business relationship, ARD GENERATOR must determine the third party’s willingness to comply with this policy and their history of compliance with applicable anti-bribery laws.
- Third parties must be made aware of our policies and expectations.
- Any agreements with a third party must have proper contract language regarding anti-bribery liability.



3.5 Recordkeeping

It is ARD GENERATOR's policy that all books, records, and accounts be kept in reasonable detail to accurately and fairly reflect transactions and assets. Entries must include reasonable detail and be fully transparent with regard to the purpose and nature of the expense. False, misleading, or incomplete entries in ARD GENERATOR's books, records, and other business documents are prohibited.

4.0 Penalties

Anti-bribery laws carry serious civil and criminal penalties for both ARD GENERATOR and individual employees. Individuals who commit anti-bribery violations can receive large fines and/or lengthy prison terms. ARD GENERATOR can also be fined and may lose opportunities for future business. Any individual who violates these laws or our policy will be subject to the most serious disciplinary action up to and including termination. Failure to comply with all applicable laws and regulations relating to bribery is grounds for immediate termination of the Volvo Group agreement.

5.0 Where to Go for Assistance

All employees are required to comply with the provisions of this policy and the anti-bribery laws throughout the world. If you become aware of any action that you believe is not consistent with this policy or applicable laws, you are required to seek assistance from an appropriate company resource by anonymously file a report or complaint with accompanying evidence by email to the whistleblower@ardgenerator.com

ARD GENERATOR shall maintain the confidentiality of the whistleblower or complainant. Information submitted with the report shall be used in the management and oversight of internal operations, or shall be disclosed in accordance with legal requirements, court order, or orders by relevant regulatory agencies. The whistleblower or complainant shall be accorded protection under the law and in accordance with the ARD GENERATOR's policies.

This policy is effective from 17 October 2022 onwards.

-Signed-

Mr. Araya Ditthawit
Chief Executive Officer