APPFOLLOW

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ANTI-CORRUPTION & ANTI-BRIBERY POLICY

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1. Purpose

This Anti-Corruption & Anti-Bribery Policy ("Policy") establishes mandatory rules, behaviors and controls aimed at preventing, detecting and responding to bribery and corruption across AppFollow Group, including AppFollow.fi Oy and AppFollow, Inc. ("AppFollow").

This Policy applies to:

- employees, officers and directors
- contractors, agents, consultants
- suppliers and business partners
- associated persons acting on behalf of AppFollow, including distributors, resellers, agents and other intermediaries.

This Policy applies globally and takes precedence where company standards exceed local minimum legal requirements.

2. Legal and regulatory framework

AppFollow adopts a zero-tolerance approach to bribery and corruption and complies with applicable laws, including:

EU & Member State legislation:

- Directive (EU) 2017/1371 on combating fraud affecting the EU's financial interests

- Directive (EU) 2019/1937 on whistleblower protection

Finnish Criminal Code (sections on bribery and abuse of office)
International best-practice frameworks:

- OECD Anti-Bribery Convention
- Foreign extra-territorial regimes (applicable by nexus):
- U.S. Foreign Corrupt Practices Act (FCPA)
- UK Bribery Act 2010 (UKBA)

Where a conflict arises, the Finnish rule applies.

3. Key definitions

For the purpose of this Policy:

(1) **Bribery** — offering, promising, giving, requesting or receiving anything of value to influence a decision or obtain an improper business advantage.
(2) **Corruption** — abuse of entrusted power for private gain, including manipulation of decisions, misuse of authority or illicit diversion of resources.
(3) **Improper Advantage** — any benefit not gained through transparent and legitimate competition.
(4) **Facilitation payments** — meaning unofficial and typically small payments made to secure or expedite routine governmental actions, are strictly prohibited. This prohibition applies regardless of local business customs or industry practice.
(5) **Public Official** includes government employees, regulators, municipal authorities, and employees of state-owned enterprises.

4. Zero-tolerance commitment

AppFollow prohibits any form of bribery or corruption, whether direct or indirect conducted through intermediaries monetary or non-monetary public or private sector related.

No employee or representative of AppFollow may offer or receive bribes or kickbacks, provide or accept improper gifts, entertainment, travel or hospitality, distort or falsify accounting records,misuse company assets for personal benefit, seek undue influence with regulators or public officials.
Political contributions on behalf of AppFollow are prohibited. Charitable donations must not be used to obtain an improper business advantage.

5. Gifts and benefits

Gifts or hospitality may only be provided or accepted if they are:

- reasonable in value
- tied to legitimate business purpose
- compliant with this Policy and local law

Any gift or other benefit with an actual or estimated value above **100 €** must be pre-approved in writing by the Finance Department before acceptance or provision. All business expenses must be accurately recorded and supported by documentation that reflects the true nature and justification of the expense. The Finance Department may maintain a register of reportable gifts and hospitality.

AppFollow acknowledges that in certain jurisdictions, industries or cultural contexts refusing hospitality may be considered inappropriate or may significantly harm the legitimate business relationship. Where accepting hospitality would constitute an exception to this Policy, employees must seek prior written approval from the Legal Department. If prior approval is not reasonably possible due to the circumstances of the event, employees must promptly disclose the hospitality received and provide sufficient details for assessment. AppFollow reserves the right to prohibit, restrict or require reimbursement for hospitality that presents a compliance risk or provides an improper business advantage.

6. Third parties and business relationships

AppFollow engages third parties responsibly and expects them to uphold equivalent ethical and compliance standards. Prior to engagement, AppFollow may perform risk-based assessments covering integrity, compliance history, potential conflicts of interest and dealings with public officials. Third-party relationships may be subject to contractual anti-corruption warranties, audit and termination rights, and compliance obligations. AppFollow may also conduct ongoing monitoring and reserves the right to terminate engagements for non-compliance.

7. Conflicts of interest

Employees and contractors must act in the best interests of AppFollow and avoid financial or personal interests that could conflict with their duties.

Disclosable situations include:

- business engagements involving family or close associates
- investments in competitors, suppliers or customers
- secondary employment or advisory functions

Undisclosed conflicts are prohibited.

Employees and contractors must not engage in external employment, consulting, advisory activities, board service or other compensated or uncompensated engagements that may interfere with their duties at AppFollow, create a conflict of interest, or adversely affect the company's business interests. Any external engagement involving employment, consulting, board membership, advisory roles or ownership interests in entities that are or may reasonably be perceived as competitors, customers, suppliers, partners or other third parties relevant to AppFollow's business must be disclosed to the Legal Department prior to commencement. AppFollow reserves the right to prohibit or restrict such engagements where a conflict of interest, competitive risk, misuse of confidential information or other compliance concern may arise. Undisclosed external engagements are prohibited.

8. Financial controls and recordkeeping

AppFollow maintains accurate books, records and accounts that reflect transactions in reasonable detail and in accordance with applicable accounting standards. AppFollow prohibits off-the-books accounts, misleading records, unaccounted funds, undisclosed assets and false expense claims. Adequate internal accounting controls shall be maintained to ensure that payments and transfers of value are properly authorised, traceable, documented and auditable.

9. FCPA and UK Bribery Act compliance

AppFollow acknowledges that the U.S. Foreign Corrupt Practices Act (FCPA) applies to certain business activities due to U.S. incorporation and customer relationships. Therefore, AppFollow prohibits:

- any payments or transfers of value to U.S. or foreign public officials to obtain or retain business
- use of third-party intermediaries to conceal improper payments
- falsification of books and records

FCPA applies to both public-sector and commercial bribery where accounting controls are implicated.

AppFollow also recognises the application of the UK Bribery Act 2010 (UKBA), which prohibits bribing, being bribed, bribery of foreign public officials, and the failure of a commercial organisation to prevent bribery. The UKBA applies to bribery in both the public and private sector and has an extraterritorial effect. AppFollow therefore prohibits any conduct that may expose the company to liability under the UKBA. AppFollow maintains proportionate procedures designed to prevent bribery by persons associated with the company.

10. Reporting concerns

Employees and third parties are encouraged and expected to report concerns related to bribery, corruption or misconduct without delay.

Reports may be submitted via:

(1) Google Forms (anonymous allowed):
(2) Email: whistleblowing@appfollow.io
(3) Postal: AppFollow.fi Oy, % Spaces, Bulevardi 21, 00180 Helsinki

Reports are handled confidentially by the Legal Department in cooperation with the People Team.

Personal data collected in connection with reports, investigations and enforcement actions shall be processed in accordance with applicable data protection laws, including the GDPR. Such data may be retained for up to five (5) years, or longer where legally required for regulatory, enforcement or litigation purposes.

11. Protection against retaliation

Consistent with EU Directive 2019/1937, retaliation against individuals who report concerns in good faith is strictly prohibited. This includes:

- dismissal or layoff
- demotion
- salary reduction
- harassment or intimidation
- negative performance actions

Good-faith reporting is protected even if concerns are not substantiated.

12. Investigations and enforcement

All credible reports of alleged misconduct will be investigated promptly and impartially. Outcomes may result in disciplinary action up to and including termination of employment or contract, as well as termination of relationships with third parties. Where required by law or regulatory obligations, AppFollow may notify competent authorities. Enforcement actions shall be applied consistently and proportionately, taking into account the severity of the violation and legal requirements.

13. Governance and oversight

The Board of Directors has ultimate responsibility for compliance oversight. The Legal Department is responsible for administering this Policy and monitoring implementation.

Version	Description	Author	Date	Approved
1.0	First version	Lawyer	30.10.2025	COO