



The Qt Group's Anti-Bribery & Corruption Policy

1 INTRODUCTION

The purpose of this Policy is to ensure compliance by the Qt Group (Qt) and its subsidiaries worldwide with the anti-bribery and corruption laws of all the countries in which Qt does or intends to do business. This anti-bribery and corruption policy applies to all employees (whether temporary, fixed term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located.

2 POLICY STATEMENT

It is our policy to conduct all of our business in an honest and ethical manner. Our stance is simple – we condemn and take a zero-tolerance approach to all corrupt business practices and refuse to take part in any act of bribery. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the world we operate.

No Qt employee or company is allowed, either directly or indirectly, to promise, offer, pay, solicit or accept bribes, facilitation payments or kickbacks of any kind. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

3 DEFINITIONS

Bribe means offering, promising or giving anything of value to improperly influence another in order to obtain business or some other commercial advantage; or Requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the awarding of business.

Bribes can include money, gifts, hospitality, expenses, reciprocal favours, political or charitable contributions, or any direct or indirect benefit or consideration.

Corruption means the abuse of power or position for money or other personal gain.

Facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Kickbacks are typically payments made in return for a business favour or advantage.

4 SCOPE

Qt and all its employees are responsible for complying with this Policy and anti corruption laws as well as the ethical and business standards outlined in the [Qt Code of Conduct](#).

All managers are expected to monitor continued compliance with the Anti-Bribery and Corruption Policy and local laws to ensure compliance with the highest moral, ethical, and professional standards.

Qt expects that its business partners are committed to anti-corruption compliance and maintain the highest level of anti-corruption practices.

This policy applies equally to the private as well as the public sector.

5 BRIBES AND CORRUPTION

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by imprisonment and/or a fine. As an employer if we fail to prevent bribery we can face an unlimited fine, and damage to our reputation. We therefore take our legal responsibilities very seriously. At Qt, bribes and corruption are forbidden in every country regardless of local custom.

6 GIFTS AND HOSPITALITY

Generally, giving gifts is discouraged at Qt. We accept only minimal and customary business gifts (such as business lunch) but other than that we do not accept gifts, entertainment nor any other business courtesies from a business partner or anyone seeking business partnership with us as it can easily create the appearance of a conflict of interest.

When providing or receiving hospitality or giving or receiving gifts one should consider whether it is appropriate, reasonable and justified under the circumstances. Qt recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Management should be sought. If corporate hospitality or gifts can be seen as bribes, it will be unlawful and harm Qt's reputation. It can also lead to criminal prosecution for those individuals involved as well as Qt.

One must not offer or receive gifts and hospitality that could improperly influence, or be perceived to improperly influence, obtaining business or other commercial advantage.

7 POLITICAL CONTRIBUTIONS AND CHARITABLE DONATIONS

Qt will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Qt accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

8 REPORTING OF VIOLATIONS, INVESTIGATIONS AND DISCIPLINARY ACTIONS

Qt views corruption and bribery very seriously and therefore encourages its employees to voice their concerns, for example through its whistleblowing procedures, when implemented, as to potential violations of this Policy.

Qt will investigate reported matters regarding corruption and bribery. A breach of this Policy may result in an employee facing disciplinary action, including termination of employment. Where a case is referred to law enforcement authorities, Qt will cooperate fully with the investigation.