

Political Involvement Policy for Infront AS and all Associated Companies

1. Introduction

Our organisation recognises the importance of civic engagement and the democratic process. We believe that our employees and representatives have the right to participate in political activities and express their political views. However, to ensure that our organisation remains impartial, transparent, and compliant with all relevant laws and regulations, we have established this Political Involvement Policy.

2. Purpose

The purpose of this policy is to:

- Define the guidelines for political involvement and expression for employees and representatives of our organisation.
- Ensure that our organisation maintains a non-partisan stance and does not engage in activities that could compromise its political neutrality.
- Comply with all applicable laws and regulations related to political activities and contributions.

3. Guidelines for Political Involvement

3.1. Personal Expression

Employees and representatives are encouraged to engage in personal political activities and express their views as private citizens. However, they must make it clear that their views are the strict expression of their personal opinion and do not represent the position of our organisation.

3.2. Use of Organisational Resources

Organisational resources, including time, equipment, and facilities, should not be used for political activities without prior authorisation obtained from the relevant C-level member of the Infront management team. Unauthorised use of resources for political activities may result in disciplinary action.

3.3. Campaign Contributions

Our organisation will not make campaign contributions to any political party, candidate, or political action committee (PAC) at a national, municipal, or local level.

3.4. Endorsements and Advocacy

Our organisation will not endorse or advocate for any specific political candidate or party. Employees and representatives must refrain from using their affiliation with our organisation to endorse or campaign for any political candidate or party.

3.5. Lobbying

Any lobbying activities by our organisation will be conducted in accordance with applicable laws and regulations. Employees engaged in lobbying must comply with all registration and disclosure requirements.

4. Reporting Obligations



Employees and representatives of our organisation are required to promptly report, to the Chief Compliance Officer, any political contributions or activities that could create a potential conflict of interest. This includes donations to political candidates, volunteering for campaigns, or any other activities that may raise concerns.

5. Enforcement

Violations of this policy may result in disciplinary action, up to and including termination of employment or contractual relationship, depending on the severity of the breach.

6. Review and Updates

This policy will be reviewed periodically to ensure compliance with changing laws and regulations and to reflect the evolving needs and values of our organisation.

7. Legal Compliance

This policy is designed to ensure compliance with all relevant national, municipal, and local laws governing political activities in the countries we operate.

8. Contact Information

For questions or concerns related to this policy, employees and representatives should contact our Compliance Officer, Andrej Seidel (andrej.seidel@infront.co).

Effective from: 10 November 2023

Zlatko Vucetic, CEO Infront Group

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Document and Review History Version	Author	Role	Comment
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