

21 December 2017

United Nations
Attn: Dmitri Dovgopoly, Director
Procurement Division

Dear Mr. Dovgopoly

Reference is made to the United Nations' ("UN") letter dated 6 September 2017 concerning the application for reinstatement with the UN Secretariat and letter dated 17 November 2017 from the UN to Atea A/S ("Atea") concerning its evaluation of the proposed independent Ethics and Compliance Expert.

In the letter dated 17 November 2017 from the UN to Atea, Deloitte was appointed independent Ethics and Compliance Expert and assigned to make an expert report based on a review of Atea's Ethics and Compliance Program, comprising the following elements:

- i. Verification that the Ethics and Compliance Program contains all the Mandatory Elements and is otherwise fully consistent with and enforceable under pertinent local, national or international laws and conventions. If the Company believes that any of the Mandatory Elements are not applicable to the Company, or cannot be lawfully implemented by the Company, the Expert shall provide a succinct explanation addressing the reasons therefor, including particular facts or legal principles upon which the Expert relies.

The mandatory elements refer to the following:

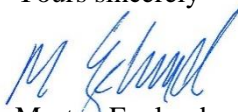
- i. Prohibition of Misconduct
- ii. Appropriate Scope and Underlying Risk Assessment
- iii. Corporate Responsibility ("Tone at the Top").
- iv. Corporate Oversight
- v. Publishing the Ethics and Compliance Program
- vi. Mandating Adherence to the Ethics and Compliance Program
- vii. Training
- viii. Advice and Reporting

- ix. Prohibition of Retaliation for Reporting Misconduct
 - x. Accurate Books and Records
 - xi. Due Diligence and Monitoring of Business Associates
 - xii. Discipline and Incentive Measures
 - xiii. Remediation of Misconduct
 - xiv. Disclosure of OFFP-Related Proceedings.
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- ii. Verification that the Ethics and Compliance Program constitutes an effective set of policies, procedures and other measures to engender ethical conduct and prevent Misconduct or violation of applicable laws.
 - iii. Verification that the Company has adopted all additional provisions recommended by the Expert and otherwise addressed all gaps or insufficiencies identified by the Expert.
 - iv. Documentary evidence underlying the Ethics and Compliance Program and its adoption by the Company. This must include, but not be limited to all documents constituting or reflecting the Ethics and Compliance Program and its adoption such as standards and procedures, codes of conduct, policies, internal controls, board or management minutes, job descriptions, training materials, guidance materials, contract forms, corporate records and other relevant information sufficient to demonstrate that the Company has adopted an effective Ethics and Compliance Program. This must include all documentation and other materials upon which the Expert has relied in reaching his or her conclusions.
 - v. The company's schedule and plans for implementing the Ethics and Compliance Program.
 - vi. Confirmations that any Company Directors, officers, employees, agents, or business associates who participated in any misconduct with regard to OFFP are no longer employed by, or otherwise associated with, the Company.

In our view, Atea has designed, developed and implemented a strong Ethics and Compliance Program and we are able to positively verify and confirm all of the above sections.

Please refer to the following pages for our detailed review of each of the sections.

Yours sincerely



Morten Egelund
Partner

The Expert's Report and Supporting Documentation

The steps below refer to the mandatory elements set out in the letter dated 6 September 2017 from the UN to Atea and specified in this letter on page 1-2. Based on the specifications from the UN, Deloitte has commented and referred to the documentation which Atea has in place relating to the specific mandatory elements.

- i. Verification that the Ethics and Compliance Program contains all the Mandatory Elements and is otherwise fully consistent with and enforceable under pertinent local, national or international laws and conventions. If the Company believes that any of the Mandatory Elements are not applicable to the Company, or cannot be lawfully implemented by the Company, the Expert shall provide a succinct explanation addressing the reasons therefor, including particular facts or legal principles upon which the Expert relies.**

The mandatory elements refer to the following:

i. Prohibition of Misconduct

Based on the occurrence of misconduct that was brought to Atea's attention in 2015, Atea has designed, developed and implemented an Ethics and Compliance Program changing procedures and controls within the organization assuring both prevention and detection. The compliance program sets out guidelines and requirements as well as rules of internal behavior at Atea.

In the compliance program, Atea has designed and implemented the following policies and procedures that set the Ethics and Compliance agenda of the organization:

Corporate Governance

The Company's Corporate Governance is on top of the Ethics and Compliance Program; please refer to "Appendix 12: Corporate governance". The Corporate Governance outlines the broad and high-level guidelines for roles and responsibilities of the Board, Management and various committees.

According to the Audit committee charter set forth in the Corporate Governance document, the Audit committee shall:

"support the Board's governance and oversight responsibilities for: Compliance with Group policies and relevant laws".

Furthermore, according to the Statement of Purpose, the Compliance committee shall:

“provide assistance to the company’s management and the audit committee to enable Atea Group to continue to operate according to the highest ethical business standards and in accordance with applicable law and regulations”.

The framework outlines the principles of the Board of Directors and management’s aim to execute their respective tasks in accordance with the highest standards for corporate governance. The principles are based on the applicable laws of Norway and regulations set forth by the Oslo Stock Exchange and the Norwegian Code of Practice for corporate governance. Norwegian law is used because the parent company of the Atea Group “Atea ASA” is listed on the Norwegian Stock Exchange. The Company’s Corporate Governance also sets forth guidelines related to Risk Management, internal controls, Ethics and financial reporting and outlines the Charter and purpose of the Areas Compliance Committee, who shall provide assistance to company management and the audit committee to enable Atea Group to continue to operate according to the highest ethical business standards and in accordance with applicable law and regulation. The criteria for the composition of the Compliance Committee and its responsibilities are also outlined in the Corporate Governance document.

Ethics and Compliance Program

Below the Corporate Governance framework are several documents that jointly shape and represent the Ethics and Compliance Program. The main documents shaping the Ethics and Compliance Program are:

- The “Code of Conduct” - please refer to Appendix 1.
- The “Compliance Program” - please refer to Appendix 5.
- The “Annual Wheel” - please refer to Appendix 7.
- The “Compliance Policy” - please refer to Appendix 10.

The main documents outlined above will be described in detail below. Furthermore, we will make references throughout the report to other relevant policies and documents supporting the Ethics and Compliance Program.

Code of Conduct

The “Code of Conduct” (hereinafter “the CoC”) reflects the “Tone at the top” and outlines the responsibilities of every employee, consultant, subcontractor or other party working on behalf of Atea, and it states a zero tolerance of violation of the CoC. All employees must undergo a training in the CoC. The CoC outlines the re-

porting line in case of need for guidance, questions or reporting related to a challenging business, legal or ethical situation, or about a potential violation of the CoC, law or business ethics by another Atea employee. The reporting line is to consult the immediate manager, the Compliance Office or the confidential Whistleblower Hotline. The section “Personal Conduct” in the CoC states that all employees must comply with applicable laws and regulations, even if these laws are not expressly stated in the CoC. Violations of laws will not be tolerated. Corruption and bribery of any kind to business contacts, government agencies or other third parties in order to influence a business decision or facilitate a legal/regulatory process is prohibited and opposed by Atea. The “Internal Control” section of the CoC states that transactions should be authorized according to the appropriate approval levels and that Atea’s financial and legal reporting shall comply with all applicable laws and regulations and be full, fair, accurate, timely and understandable. In addition, the “Internal Control” section states that all Atea employees have a responsibility to safeguard the confidentiality of sensitive information related to Atea, its employees and outside parties with whom Atea interacts.

According to the section “Social responsibility” in the CoC, Atea firmly opposes to all forms of corruption and that Atea will work against corruption in all forms, including extortion and bribery, in accordance with the UNGC principles.

Compliance Program

Atea has designed and implemented a document named Compliance Program, please refer to Appendix 5. Atea’s Compliance Program is based on the Code of Conduct, please refer to Appendix 1, and intended to work as an Anti-Bribery Management System, enabling Atea to comply with the requirements of the UN Global Compact, the UK Bribery Act and relevant legislation in the countries in which Atea acts. Atea takes risk factors such as market place, products & services, customers and competition into consideration when carrying out, monitoring and updating the Compliance Program. The Compliance program is designed to focus on and comply with the principles of the ISO 37001 certification (Anti-Bribery management Systems). Additionally, Atea had set a strategic goal when developing and implementing the Compliance Program of becoming ISO 37001 certified, which was reached in December 2017 when Atea was awarded the 37001 certification issued by Bureau Veritas (the first verification of any company in Denmark). Please refer to Appendix 13 for a copy of the ISO 37001 certificate.

The Compliance Program describes the method for identification of risk areas and includes a summary of the 13 areas currently identified as “Risk Areas”. Each risk area contains the following elements:

- Description of the area
- Risk description
- Employee group (who could be exposed to the risk or who has previously been involved in incidents)
- Probability (ratings from 1 to 5)
- Impact (ratings from 1 to 5)
- Risk elimination and controls (description of control in place)
- Residual risk (residual risk after the effect of the implemented control(s))
- Monitoring action (description of the monitoring actions planned for this risk area and scheduled in the annual wheel)
- Sanction options (types of corrective actions).

Annual Wheel

In the Compliance Program mentioned above, reference is made to an Annual Wheel; please refer to Appendix 7. The Annual Wheel provides an overview and serves as a schedule for each of the tasks required to be performed throughout the year. The required activities are:

- Monitoring and control of identified risks (every month)
- Management meetings (once every quarter)
- Compliance committee (once every quarter)
- Evaluation of risk areas (once a year)
- Changes to the business (every month)
- Compliance advisory board (twice a year)
- ISO certificate (once a year)
- Risk descriptions (once a year)
- Evaluation of the Compliance Officer's role by the CFO (once a year)
- Audit of the anti-bribery management system (once a year).

It is possible to add or remove Risk Areas throughout the year in case of major changes to business operations, organization, competitive situation, etc. The Annual Wheel keeps track of the current and historical Risk Areas. The actual Risk Areas are outlined and individually described in the Compliance Program; please refer to Appendix 5.

Compliance Policy

The Compliance Policy, please refer to Appendix 10, outlines specific guidelines for all Atea employees in Denmark for the prevention of corruption, bribery and kickbacks in relation to the following areas which are described in detail:

- Gifts
- Hospitality
- Travel
- Customer events
- Sponsorships and similar activities.

The policy guides the employees on when to consult, when to act and when and where to report any signs of possible misconduct in relation to corruption, bribery, etc.

We have verified that the Ethics and Compliance Program contains all the mandatory elements of a generally accepted international compliance program and that it is fully consistent with and enforceable under local law.

ii. Appropriate Scope and Underlying Risk Assessment

The Code of Conduct, please refer to Appendix 1, is applicable to all Atea branches and all employees, affiliates or third parties. Furthermore, the Compliance Policy, please refer to Appendix 10, is applicable to all employees hired with Atea Denmark.

As part of establishing an ethics and compliance program, Atea established a task force, which had to identify any potential areas of risk in business areas, with customers, external parties, suppliers, etc. The task force included top management, relevant sales directors and other employees from legal and financial functions. Atea also invited external experts to the identification process, including Deloitte. The task force held discussions, workshops, made analyses, internal inquiries and received input from internal and external stakeholders. Initially, 17 Risk Areas were identified, which were subsequently reduced to 13 key Risk Areas as of December 2017. The process, scheduling and responsibility of the Risk Assessment and the monitoring, recording and tracking of current and historical Risk Areas are documented in the Compliance Program and the Annual Wheel.

We have verified that Atea performs a continuous update of Risk Areas based on the Risk Assessment.

iii. Corporate Responsibility (“Tone at the Top”).

Atea has implemented the CoC, please refer to Appendix 1, that sets the Company’s “Tone at the Top”. Deloitte has verified that the Company’s CoC encourages

to ethical conduct and compliance with applicable laws and does not tolerate Misconduct. The Ethics and Compliance program and all related policies and documents have been made available to all employees through the Company's intranet site, please refer to appendix 9: Screenshot from intranet, and to external stakeholders through the Company's official website. Top Management participates in Compliance "Road shows", which are presentations held by the Compliance Officer and the Legal and Compliance Director for Atea employees in branches throughout Denmark, please refer to Appendix 8.

In June 2017, as a part of its ongoing statements in relation to Atea's status of implementing a compliance program, Deloitte commented on Atea's top-level commitment. Deloitte stated that top management has introduced many initiatives, such as meetings with internal/external stakeholders, articles in internal and external communication channels, town hall meetings, management meetings, strategy sessions, compliance roadshows and a well-organized governance structure. Deloitte also stated that a strong top-level commitment that set the tone at the top was present in the organization, please refer to Deloitte's statement as of June 2017: Appendix 45.

iv. Corporate Oversight

The Atea Group has created a Compliance function in the Legal department in Denmark. This function covers and is responsible for all Danish subsidiaries. The Compliance function reports directly to top management with reference to the CFO and has the mandate to make any necessary decisions in order to adhere to the Compliance Program. Top Management is overall responsible for the Anti-Bribery Management System, but the Compliance Officer is responsible for the day-to-day activities and maintenance. The Compliance Officer reports on a quarterly basis to the Group Compliance Committee which reports to the Audit Committee. Based on the information available, Deloitte's assessment is that the Compliance Officer has the necessary competencies and resources available, has adequate authority, access to governing bodies and autonomy to perform the required assignments. Furthermore, the compliance function is also responsible for monitoring the Risk Areas and creating monitoring reports for management for review and application of sanctions, if needed.

We verify that Corporate Oversight is in place.

v. Publishing the Ethics and Compliance Program

All Atea policies, including the Compliance Policy (Anti-Corruption Policy), guidelines and responsibilities and the Whistleblower Guide are uploaded on the Company's intranet site and made available to all employees. Please refer to Appendix 9: Atea Intranet. In addition, all employees are required to complete a training in the Company's CoC, please refer to vii. Training section.

Furthermore, Deloitte has verified that the Company has made documents relevant for the Ethics and Compliance Program available on their public website. The documents include:

- Code of Conduct (CoC)
- Supplier Code Of Conduct documents
- Corporate Governance
- Compliance Policy
- Whistleblower scheme (direct and anonymous reporting lines).
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Please refer to Appendix 46: Screenshot from Atea's homepage.

We verify that the Ethics and Compliance Program has been published.

vi. Mandating Adherence to the Ethics and Compliance Program

Deloitte verifies that necessary clauses related to misconduct are included in employee contracts, please refer to Appendix 47: Clause in employee contract. Furthermore, Atea has included the following material in contracts with third parties: Code of Conduct, anti-corruption language, audit rights and terminations clauses. For further details, please refer to section xi. Due Diligence and Monitoring of Business Associates. Additionally, Atea was awarded the ISO37001-16 certification in December 2017, please refer to Appendix 13: Certification.

We verify Adherence to the Ethics and Compliance Program.

vii. Training

Atea requests employees to complete training (e-learning) in CoC and compliance policies once a year. The training is tracked by Compliance and reminders are sent to employees who have not completed the training timely. Atea's operational goal is that at least 95% of all employees have completed and passed the training. The reasoning for not aiming at 100% is sick leave, maternity leave and also ongoing hiring of new employees. The training is divided into four employee groups:

- a) Leaders
- b) Consultants
- c) Sale
- d) General Management.

Please refer to an extract from the training system (Knowledge portal) for the training records, Appendix 3. Furthermore, please refer to Appendix 4 and 11 for the questions included in the test.

We verify that training in the Ethics and Compliance Program is performed.

viii. Advice and Reporting

For employees seeking advice or guidance, Atea has a compliance/legal department in Atea Denmark that is open for all employees within normal working hours. Outside normal working hours, Atea has a hotline: compliance@atea.dk allowing employees to address questions and get guidance 24/7. In case of a need or wish to report anonymously, Atea does have its whistleblower system, please refer to section V. Remediation of Misconduct for more details. Besides this, Atea also uses its intranet to upload policies and guidance, and it sends emails in plenum to advice on hot topics and relevant subjects, please refer to Appendix 49: Emails sent out to employees.

We verify that Advice and Reporting is in place.

ix. Prohibition of Retaliation for Reporting Misconduct

In Atea's whistleblower scheme or guide is stated that all data will be treated as confidential. The reporting can be either anonymous or open, but either way, Atea will not sanction an employee on behalf of a reporting, if this subsequently proves to be unfounded, please refer to Appendix 18: Whistleblower scheme.

We verify prohibition of retaliation for Reporting Misconduct.

x. Accurate Books and Records

Atea has implemented financial controls and procedures to ensure that all financial transactions are correct and complete and timely to ensure reliable accounting, including prevention, detection and subsequent verification of intentional and unintentional errors and deficiencies as well as compliance with applicable legislations. The document Appendix 52: Financial controls describe the controls in place to reduce the bribery risk.

Furthermore, Deloitte is the financial auditor and is signing the annual report each year after its review following Danish legislation on auditing. Please refer to Appendix 50: Statement from the auditors and the annual report, Appendix 51: Annual Report. Atea is listed on the Oslo Stock Exchange and required to adhere to the highest accounting and reporting standards.

We verify that accurate books and records are in place.

xi. Due Diligence and Monitoring of Business Associates

When engaging business associates, Atea divide these into three different groups: strategic business partners, non-strategic business partners and local business partners as the risk profile is handled differently for the three types.

Strategic business partners:

For the strategic group, these business associates are handled on a group level, which means that category management in Denmark is not able to go forward with a purchase without a group level approval. The associates classified as strategic are initially requested to complete a survey to uncover the associates' own risk management process and internal controls that are in place. Furthermore, the associates are required to comply with the industry association's code of conduct EICC or similar industry code of conduct in which anti-bribery management should be incorporated. Beside the survey and compliance with industry association's code of conduct, Atea is performing a Risk Assessment based on two parameters: Management system and transparency. The associates are ranked based on the maturity of their internal management systems and the transparency of these.

Non-strategic business partners:

For the non-strategic group, Atea performs the same process as mentioned for strategic business partners, but without validating the parameters "management system" and "transparency". In 2016, Atea ran a pilot project concerning the implementation of a risk-based approach to supplier management. In this project 32 partners were selected and validated through the EICC (Electronic Industry Citizenship Coalition) online system on different parameters and plotted into a ranking system. Deloitte has seen and validated this documentation. Because of confidentiality and personal information, this documentation is not provided.

Local business partners:

The local business partners (in Denmark) is handled by the Danish procurement department. Category management in Denmark has decided that all business partners are required to sign a new agreement, in which they acknowledge to work under the EICC code of conduct or similar industry code of conduct. The clause and reference to standard can be found in section 3 in the contract form for business partners. Please refer to Appendix 39 and 40: Contract templates.

The three types of business associates mentioned above are referred to in Appendix 42: Supplier creation and Maintenance_APP.

In addition, before proceeding with the business partner, Atea follows a work instruction, please refer to Appendix 42: Supplier Creation and Maintenance - Work Instruction. This guide explains the flow that needs to be followed to create a new supplier in the system and ensures that all creations are reviewed and approved and credit checked prior to creation.

When entering into a business relationship, Atea requires a contract between the two parties to be in place. Please refer to templates that have been developed: Appendix 39 and Appendix 40. The contract outlines services, terms and conditions as well as a clause regarding code of conduct, anti-corruption language, audit rights and termination clauses.

With regard to monitoring third parties, this is a Risk Area identified in Atea's internal document "Compliance Program", please refer to Appendix 5. Third parties are monitored on an annual basis, cf. the Annual Wheel, please refer to Appendix 7.

We verify that due diligence and monitoring of business associates are performed.

xii. Discipline and Incentive Measures

Atea performs both preventive and detective actions in relation to misconduct. The preventive actions comprise e.g. trainings, policies and internal procedures. The detective actions are based on compliance monitoring. The monitoring is based on a Risk Assessment where 13 Risk Areas have been identified. The Annual Wheel sets out when to perform the monitoring for each single risk. For each Risk Area, Atea has specified in the Compliance Program, please refer to Appendix 5: Compliance Program, the proceedings for collecting samples for the specific areas. Furthermore, Deloitte has assisted Atea in developing a comprehensive monitoring program that

is completed for the selected samples per risk area. Based on testing of samples and interviews with key stakeholders, a monitoring report is made and sent to the management team. Please refer to Appendix 19-37: Monitoring reports. Management is adding its management response and applying sanctions, if needed. Atea has described the process for sanctions in a guide: process for designing reports in relation to monitoring, Appendix 14. If it is concluded that one or more employees are not following internal procedures or policies, there are five possible outcomes:

- The employee receives a manual/procedure
- The employee is given a reprimand
- The employee receives a verbal warning
- The employee receives a written warning
- The employee is dismissed.

The guide outlines under each possible outcome when and why the specific outcome is valid as a sanction.

We verify that discipline and incentive measures are in place.

xiii. Remediation of Misconduct

As outlined above, Atea has implemented a monitoring scheme which has been set out in the Annual Wheel to validate whether there is any misconduct or other violations of policies and procedures. Beside the monitoring, Atea has also implemented other measures for investigating misconduct and other violations. Atea has a whistleblower system, to which both internal and external individuals can report. There are three options for reporting:

- Report to your immediate leader
- Report to compliance - compliance@atea.dk
- Report anonymously via the whistleblower system.

Please refer to the description of the whistleblower system Appendix 18: Whistleblower scheme.

Based on these reports, Atea has started performing investigations, please refer to Appendix 38: Investigation, where the procedure is described; because of confidentiality these are not attached.

We verify that remediation of misconduct is performed.

xiv. Disclosure of OFFP-Related Proceedings

The abbreviation is assumed to be standing for “Oil For Food program”, which is not applicable to Atea. Atea’s case and lawsuit are not related to OFFP and therefore regarded as non-applicable to this evaluation.

ii. Verification that the Ethics and Compliance Program constitutes an effective set of policies, procedures and other measures to engender ethical conduct and prevent Misconduct or violation of applicable laws.

The compliance program comprises the following policies and procedures to prevent but also detect misconduct:

- The “Code of Conduct”, please refer to Appendix 1.
- The “Compliance Program”, please refer to Appendix 5.
- The “Annual Wheel”, please refer to Appendix 7.
- The “Compliance Policy”, please refer to Appendix 10.

Please refer to section i. Prohibition of Misconduct for an in broader description of the policies.

Furthermore, Atea has implemented specific guidelines for high-risk areas, such as

- Supplier events abroad, please refer to Appendix 15.
- Foreign events, open events and open invitations, please refer to Appendix 16.
- Foreign events for groups, please refer to Appendix 17.

We verify that the Ethics and Compliance Program constitutes an effective set of policies, procedures and other measures to engender ethical conduct and prevent misconduct or violation of applicable laws.

iii. Verification that the Company has adopted all additional provisions recommended by the Expert and otherwise addressed all gaps or insufficiencies identified by the Expert.

Deloitte has not identified any gaps or insufficiencies requiring any additional actions by Atea.

iv. Documentary evidence underlying the Ethics and Compliance Program and its adoption by the Company. This must include, but not be limited to all documents constituting or reflecting the Ethics and Compliance Program and its adoption such as standards and procedures, codes of conduct, policies, internal controls, board or management minutes, job descriptions, training materials, guidance materials, contract forms, corporate records and other relevant information sufficient to demonstrate that the Company has

adopted an effective Ethics and Compliance Program. This must include all documentation and other materials upon which the Expert has relied in reaching his or her conclusions.

Please refer to the description under i., and the following references:

a. Standards and procedures and policies:

- “Compliance Program”, please refer to Appendix 5.
- “Compliance policy” please refer to Appendix 10.
- Supplier events abroad, please refer to Appendix 15.
- Foreign events, open events and open invitations, please refer to Appendix 16.
- Foreign events for groups, please refer to Appendix: 17
- “Corporate governance”, please refer to Appendix: 12.
- “Annual Wheel”, please refer to Appendix 7.
- “Guidance Supply chain”, please refer to Appendix 44.
- “How to handle third parties”, please refer to Appendix 41.
- “Supplier creations and maintenance”, please refer to Appendix 42.
- “Atea procurement agreement Presentation”, please refer to Appendix: 43.

b. Code of conduct:

- “Code of conduct” please refer to Appendix 1.
- “Supplier code of conduct”, please refer to Appendix 2.

c. internal controls:

- “Process monitoring”, please refer to Appendix: 14.
- “Financial controls”, please refer to Appendix: 52.

e. board and management minutes:

- “Board and management meetings”, please refer to Appendix: 37.

f. job descriptions:

- “Resource description compliance”, please refer to Appendix: 6.

g. training materials:

- Questions to compliance training”, please refer to Appendix 4 and 11.

h. guidance material

Please refer to a. standards and procedures and policies.

- “Compliance Roadshow”, please refer to Appendix: 8.

i: contract forms

- “Procurement agreement”, please refer to Appendix 39.
- “Atea consultant purchase agreement”, please refer to Appendix 40.

v. The company’s schedule and plans for implementing the Ethics and Compliance Program

Atea has implemented a compliance program comprising, inter alia, an Annual Wheel with activities to be performed each single month of the year. The Annual Wheel is based on a Risk Assessment, where 13 risk areas have been identified. For these 13 Risk Areas, the Annual Wheel outlines in which month the specific Risk Area has to be tested. Thus, e.g. “udlandsrejser” (travels abroad) will be monitored in May and November every year. Besides the ongoing monitoring of the 13 identified Risk Areas, the Annual Wheel also outlines that management meetings and compliance committee meetings have to be held once every quarter. Furthermore, the Wheel includes the element “update of the compliance program”, which consists of an evaluation of the identified Risk Areas (once a year), updates to the compliance program based on business changes (ongoing every month), compliance advisory board (twice a year), continued maintenance of obtained ISO certificate 37001-16 and risk descriptions (once a year). The last elements of the Annual Wheel are “evaluation of the Compliance Officer's role by top management”, “audit of the organization’s anti-bribery management system” and, not least, “training and education of employees within the organization” (once a year).

Please refer to the “Appendix 7: Annual Wheel”. Furthermore, please refer to i. for a more detailed description of the performed activities mentioned in the Annual Wheel.

vi. Confirmations that any Company Directors, officers, employees, agents, or business associates who participated in any misconduct with regard to OFFP are no longer employed by, or otherwise associated with, the Company.

Deloitte has verified that all employees charged with fraud or bribery as described in the indictment have been terminated. Furthermore, we have requested the HR Director to verify that all of the employees involved are no longer employed with Atea, please refer to “Appendix 48: HR Director”. Because of confidentiality we have not included any names in this section.