

AMBER ADVISORY – CODE OF CONDUCT AND ANTI-BRIBERY & CORRUPTION POLICY

As of January 2025, BBC SIA operates under the brand name Amber Advisory in Latvia.

1. Our Commitment

Amber Advisory is a consultancy specializing in business and government relations. We are committed to upholding the highest standards of professional ethics, transparency, and compliance with applicable national and international laws. We maintain a zero-tolerance policy toward bribery and corruption and strive to conduct our operations fairly, honestly, and openly, in line with the legislation of the Republic of Latvia, the U.S. Foreign Corrupt Practices Act (FCPA), and other relevant international frameworks.

2. Code of Conduct

At Amber Advisory, we believe that ethical and informed participation in the policymaking process enhances democratic outcomes. Our consultants play a key role in ensuring that policymakers hear relevant and balanced perspectives.

Our Professional Principles:

- We support clients in articulating their interests transparently and respectfully to decision-makers.
- We act as a reliable and accurate source of information, respecting both public and private interests.
- We operate in strict compliance with institutional rules, processes, and boundaries.

All consultants and staff must:

- Maintain high standards of accuracy, integrity, and professionalism in research and communication.
- Identify themselves and their affiliation with Amber Advisory when engaging with public institutions.
- Disclose the nature of the interests they represent.
- Conduct themselves in a courteous, lawful, and ethical manner.
- Respect confidentiality obligations while balancing client interests with the public interest.
- Adhere to the legal and procedural requirements of public institutions.

All Amber Advisory personnel and special advisers are contractually obligated to comply with these principles of honesty, transparency, and accountability.

3. Anti-Bribery & Corruption Policy

Policy Statement:

Amber Advisory values its reputation and is committed to maintaining the highest ethical standards in all business activities. We strictly prohibit any form of bribery, facilitation payments, or corrupt conduct in any jurisdiction.

Scope and Applicability:

This policy applies to all employees, consultants, special advisers, sub-contractors, and any third parties acting on behalf of Amber Advisory.

Prohibited Conduct Includes:

- Offering, giving, soliciting, or accepting a bribe in any form (cash or otherwise)
- Engaging in corrupt conduct with public officials, private companies, or individuals for business gain
- Seeking improper commercial, regulatory, or personal advantage through unethical practices

Training and Guidance:

Amber Advisory provides periodic training to ensure that all personnel understand their responsibilities under this policy and the relevant legislation (Latvian and international, including FCPA). These training sessions are conducted on a regular basis and upon onboarding.

Additionally, corporate ethics risks are reviewed and discussed at the outset of every new client project, helping teams identify and mitigate compliance risks early on.

Incident Reporting:

All employees are encouraged to report potential breaches to the Director of Amber Advisory. All reports are treated confidentially, and whistleblowers are protected.

Monitoring and Review:

Compliance with this policy is regularly monitored. Any violations are reported to the Directors and managed under internal disciplinary procedures. The policy is periodically reviewed and updated in line with changes in law or best practice.

4. Third-Party & Partnership Compliance

Our Partners:

Amber Advisory works with partners, subcontractors, and suppliers who demonstrate a commitment to integrity, transparency, and respect for international compliance standards. We expect our partners to operate in alignment with our ethical values and with widely recognized principles, including those established by the OECD, UN Global Compact, and EU regulations on corporate governance and anti-corruption.

Partner Evaluation:

- Before entering into a new partnership or subcontracting arrangement, Amber Advisory performs a due diligence assessment, which includes an evaluation of compliance risks, legal integrity, and alignment with ethical standards.
- We require partners to acknowledge and commit to our Code of Conduct and Anti-Bribery & Corruption Policy.
- Whenever possible, we seek to include our Code of Conduct or equivalent compliance clauses in all collaboration agreements and contracts.

5. Risk Assessment Procedure

To further strengthen our anti-corruption framework, Amber Advisory is developing a formal procedure to assess corruption and integrity risks, especially when entering new markets, sectors, or working with new clients. This process may include:

- Country- and sector-specific risk analysis
- Internal pre-engagement checklists
- Structured discussions during project intake
- Escalation or approval mechanisms where red flags arise.

6. Ethics Oversight and Designation of Responsibility

As part of our future-proofing strategy, Amber Advisory intends to designate an Ethics Officer or establish a small internal Compliance and Ethics Oversight Function. This role or function will support the effective implementation of this policy, serve as a

contact point for internal ethical questions, and ensure alignment with evolving legal and best-practice requirements.

7. Policy Updates

This document will be updated as necessary, particularly to reflect:

- New legislation in Latvia or internationally
- Changes to relevant institutional rules governing lobbying or interest representation
- Best practices in ethical consultancy and anti-bribery compliance