

# Anti-Bribery and Corruption Policy

Version: December 2025

Owner: President and CEO

Adopted by the Group Management Team on December 5, 2025.

This policy is to be reviewed on a regular basis.

## 1. Introduction

Fagerhult Group is committed to the highest norms of responsible business conduct. We have zero tolerance of bribery or corruption in any form and will be proactive in following ethical business practices. Corruption and bribery in any form contradicts our values and damages the trust and confidence of our customers, shareholders, business partners, employees and other stakeholders have in us. Corruption and bribery also contradict values of democracy and violates the laws in the countries where we do business. In addition to harming our business and reputation, violation of these laws can have significant and serious legal and financial consequences for Fagerhult Group, as well as for individuals, who participate in corrupt business practices.

This Anti-bribery and corruption policy apply to all employees, and other representatives acting directly or indirectly on behalf of Fagerhult Group (and, thus, any of our Group companies). This includes business partners such as consultants, distributors and sales agents, and other service providers.

Fagerhult Group is also expected to abide by all national and international applicable Anti-Bribery and Corruption laws and regulations, such as the US Foreign Corrupt Practices Act, the UK Bribery Act and similar laws in every country in which we operate.

## 2. Purpose and scope

The purpose of this policy is to support and enable anyone acting for, with or on behalf of Fagerhult Group, to act in line with our values, rules and expectations. We expect all employees and business partners to read, understand and follow this policy and consistently apply its high standards when doing business for, with or on behalf of Fagerhult Group.

This policy is valid for all companies within the Fagerhult Group, as well as for our joint ventures and joint operations and applies to all our employees and other representatives acting directly or indirectly on behalf of Fagerhult Group, as well as consultants and agency personnel, who work at Fagerhult Group premises or under the direction of Fagerhult Group. Fagerhult Group expects any business partner to act to the same standards of honesty, integrity and fairness, including through contractual provisions requiring compliance with the principles set forth in this policy, our Business Partner Code of Conduct and applicable laws. This policy provides an overview of Fagerhult Group's commitment and principles against bribery and corruption.

## 3. Principles

Fagerhult Group is committed to the highest norms of business conduct. We act in a responsible way, based on our Code of Conduct. Fagerhult Group makes a clear statement with zero tolerance against bribery and corruption. We do not offer, promise, authorize, provide, request, accept, receive, pay bribes or anything of value, either directly or indirectly, to influence a decision, to obtain or retain business or to secure an improper advantage. We avoid an interest or situation that conflicts, or may appear to conflict, with our professional duty. We do not support any stakeholder with financial means when we suspect, or have reason to suspect, that funds will be – partially or wholly – used to pay a bribe, induce, encourage or reward a decision.

Facilitation payments are payments (normally small or insignificant put into relation to the gains of such payments) made with the purpose to have services carried out which the person making the payment is legally entitled to receive or which disrupt the commercial and competition business landscape. Fagerhult Group strictly prohibits making, authorising or accepting facilitation payments, whether made it directly or indirectly through a third party. All requests and demands for facilitation payments must promptly be reported internally.

## **4. Reporting**

Fagerhult Group reports on compliance with relevant and applicable anti-bribery and corruption legislation and rules each year in our Annual and Sustainability Report. The reporting is reviewed annually in a process which involves the Group companies, internal and external stakeholders and is validated by the Group Legal Counsel and audited by Group's main auditor.

## **5. Framework**

This Anti-bribery and corruption policy is part of Fagerhult Group's set of policies, which all support the ambition to contribute to a more sustainable world:

- Code of Conduct
- Code of Conduct for Business Partners, as well as the Policy for Human Rights, Policy for Working conditions, and the Policy for Conflict Minerals, and
- Other Fagerhult Group policies, such as the Environmental policy, the Diversity and inclusion policy, and the Health and safety policy.

The following Swedish and international guidelines are to act as a guide of applicable principles:

- The Swedish Anti-Corruption Institute's (IMM) Code to Prevent Corruption in Business,
- The OECD Anti-Bribery Convention and related documents, and
- The OECD Guidelines for Multinational Enterprises.

## **6. Governance and responsibilities**

This Anti-bribery and corruption policy is embedded across Fagerhult Group's operations and is an integrated component of the Group's corporate governance framework.

Fagerhult Group has a whistleblowing function. We encourage all our employees and business partners to report any violations of our policies. The whistleblowing function is available on our website. For us, the whistleblowing function is important to maintain our high ethical standards and the customers' and the publics' confidence in us.

The Board has the ultimate responsibility for the Group's operations and conduct of business. The President & CEO regularly update the Board on the Fagerhult Group's continuous work in adhering to the framework of policies.

Each Fagerhult Group company Managing Director has the ultimate responsibility for implementing and adhering to the Group's policies, and to regulations and guidelines at the local level. This includes relevant national laws and other regulations such as legislation on working conditions and human rights. Each Managing Director is responsible for communicating the content and importance of Group policies throughout their respective company.

All Fagerhult Group employees are individually responsible for reading, understanding and complying with this policy. Each employee is responsible for acting in accordance with this policy, every line manager is responsible for making sure each team member has access to this policy and other guidelines. The line manager is also responsible for ensuring that relevant procedures and internal controls are followed to prevent and detect bribery and corruption. Day-to-day reinforcement, including regular information and training on anti-corruption issues, as well as compliance follow-up, is part of every manager's responsibility. Violations against this policy will lead to disciplinary action.