



## Anti-Corruption Policy

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Responsible for: Daniel Kaplan, CEO

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Table of contents

- 1 Introduction..... 3
  - 1.1 Scope and availability ..... 3
  - 1.2 Purpose..... 3
  - 1.3 Doubt over whether a benefit or advantage is permitted ..... 3
  - 1.4 Breaches..... 3
- 2 Target group and relation to laws, rules and other policies ..... 3
- 3 Roles and responsibilities ..... 3
- 4 Zero tolerance of corruption ..... 4
  - 4.1 What is corruption? ..... 4
  - 4.2 The receipt and giving of all types of benefits and advantages ..... 4
- 5 Responsibilities and reporting ..... 7
- 6 Contact information ..... 8
- 7 Exemptions ..... 8
- 8 Related documentation..... 8
- 9 Version history..... 8

## 1 Introduction

This anti-corruption policy, along with Storskogen's Code of Conduct, sets out Storskogen Group AB (publ) and its subsidiaries' (**Storskogen**) fundamental business ethics guidelines and core values on how Storskogen interacts with stakeholders, i.e. customers, society, suppliers, partners and government authorities, and how we interact with each other at Storskogen.

This anti-corruption policy applies to all contact with customers, suppliers and other business contacts.

Storskogen applies the Code to Prevent Corruption in Business (the Business Code), which came into effect on 14 August 2020. Further information regarding benefits within business can be found in the Business Code, which is available at [www.institutetmotmutor.se](http://www.institutetmotmutor.se).

### 1.1 Scope and availability

This policy covers all employees, the board of each subsidiary and Storskogen Group AB (publ), CEOs, consultants, temporary employees and other workers at Storskogen. The CEOs of each subsidiary must ensure that this policy is implemented at all operating subsidiaries and that it is available to all persons affected by the policy. Storskogen employees should read the policy annually or more frequently if necessary.

### 1.2 Purpose

The purpose of this anti-corruption policy is to specify the principles that apply within the Storskogen group regarding the giving and receiving of benefits and advantages, and to make it easier for employees to judge whether or not a benefit is permitted.

### 1.3 Doubt over whether a benefit or advantage is permitted

If you have a question about what is permitted as a benefit, talk to your line manager or HR.

Employees should report benefits that might deviate from this anti-corruption policy to their line manager to assess whether the benefit may be accepted or given.

If you are in doubt as to whether or not a benefit is permitted, advice can be obtained from the business area manager or Storskogen's chief legal officer.

If you remain in doubt, the benefit should not be given or accepted.

### 1.4 Breaches

If an employee becomes aware of a breach of this anti-corruption policy this should be reported. You will find more information on how to report under Section 5 Responsibility and reporting.

## 2 Target group and relation to laws, rules and other policies

This policy applies to the entire Storskogen group. Storskogen must, without exception, comply with applicable laws and rules in all countries in which Storskogen's companies conduct business. In some situations, such as in countries with weak legislation or controls, the requirements in this anti-corruption policy may be more rigorous than local legislation and customs and conventions. In such cases we should always comply with this anti-corruption policy and our own principles. The opposite applies to those cases where local legislation or regulations are stricter than this anti-corruption policy. Likewise, subsidiaries are free to adopt its own anti-corruption policy to apply a stricter policy regarding anti-corruption and to manage issues with a greater level of detail if it so wishes. If other internal guidelines within a subsidiary conflict with this document, this policy takes precedence.

## 3 Roles and responsibilities

Below are the roles that should be in place at each company.

Role/job title	Responsibility
Board of Directors	Approval of anti-corruption policy.
Policy owner	Ultimately responsible for this policy.
The CEO of each subsidiary	Responsible for ensuring that the business fulfils the anti-corruption policy and its implementation.
Employees	Responsible for complying with the policy and reporting incidents and breaches of the policy or legislation.

## 4 Zero tolerance of corruption

Storskogen shall under no circumstances, whether directly or indirectly, accept offers of, give, demand or receive any form of bribery, undue or inappropriate benefit, service, incentive or nepotism.

The risk of corruption should therefore be evaluated in each business relationship, based on factors such as business partners' activities, geographical location and representatives.

This document is designed to support and help employees recognise, avoid and manage situations in which corruption and bribery may occur.

### 4.1 What is corruption?

Corruption is characterised by a broad spectrum of prohibited actions and may take the form of everything from small payments to facilitate standard administration, to payments to illegally gain large public-sector contracts. Corruption may also include various forms of bribery, prohibited commission, blackmail, fraud, deception, breach of understanding and other unacceptable actions.

Under this policy, the term corruption is used as the designation for all kinds of activities that involve abuse of allocated responsibility and/or position in order to achieve personal and/or business advantages. Some activities may be illegal and others unacceptable with regard to Storskogen's business integrity. This consequently includes a range of activities such as bribery, conflicts of interest and incorrect use of company assets. Regardless of which they are in any case prohibited under the terms of this policy.

*Bribery* means promising, offering, giving, accepting or requesting an undue advantage to or from a person or entity, either directly or through an intermediary, in an attempt to influence a person's actions or decisions in order to gain business advantages. Undue advantage refers to anything of value, such as money, an object that represents value, entertainment, a privilege or benefit, or some form of promise to influence a person in a position of authority or public service. The term bribery also includes 'facilitation payments' to government authority representatives in order to facilitate or speed up administration with the government authority.

Corrupt officials and criminal behaviour may be encountered in all parts of the world. Some jurisdictions, with weak institutions and limited rule of law, pose particular challenges. Corruption can occur in different business areas and activities, usually in connection with procurement, the signing of contracts, design/construction and purchasing processes, and consists of gifts, entertainment and hospitality, facilitation payments and contributions to political organisation or charities.

### 4.2 The receipt and giving of all types of benefits and advantages

The following general requirements apply to the receipt and giving of all types of benefits.

#### 4.2.1 Undue advantage

Certain benefits are such that they are always prohibited, regardless of the circumstances, such as the following advantages:

- (a) monetary gifts, gift vouchers and similar items that are equivalent to cash,
- (b) monetary loans, the provision of collateral (guarantee commitments), remission of claims, repayment, interest and similar on terms that are not market-based,
- (c) work at the recipient or delivery of goods or services for private purposes and on terms that are not market-based,
- (d) something that is associated with a service in return and is not approved by the recipient's employer or client,
- (e) hidden commission for an employee or contractor (i.e. other than the company),
- (f) use of vehicles, boats, holiday homes or similar for private use, or
- (g) fully or partially paid-for hospitality or holiday trips.

Since the benefits specified above are improper due to the fact that they are of such nature that they could be deemed to influence behaviour and therefore are prohibited, no particular assessment of permissibility need be conducted. It is not possible to establish an exhaustive list of prohibited benefits and advantages and the above list is therefore not exhaustive. Other similar benefits may also be prohibited. Assessment is made case by case, and as per Section 1.3 above, employees should consult their line manager or HR if in doubt.

#### 4.2.2 Nature of benefits and advantages

Benefits can take a variety of forms, and benefits that are not of financial value may also be covered by this policy. It might, for example, be membership of an exclusive club, a prestigious award or a benefit that, while not having financial value, is personally valuable to the recipient (e.g. sentimental value).

- (a) A benefit may not be given or received where the purpose is or is suspected to be influence over the recipient's behaviour or decisions.
- (b) Benefits may never be given or received if they are associated with conditions regarding particular action for the recipient.
- (c) Benefits that are given or received must be objectively moderate and characterised by transparency and be a natural and beneficial part of the service being provided.
- (d) Business contact with persons with whom the employee is friends should be avoided and/or considered carefully. In cases where an employee intends to enter into an agreement with a party where there is a risk of the situation being regarded as or appearing to be a conflict of interest, decisions should
- (e) always be taken by an independent party higher up in the organisation. This means, for instance, that decisions must be taken by a business area manager instead of the CEO of the relevant company.

#### 4.2.3 Facilitation payments

Storskogen does not accept facilitation payments, which comprise payments to speed up government authority and other officials' implementation of procedures. Implementation of procedures may include processing of official documents, the issue of licences and permits, customs clearance of goods or the receipt of appropriate police protection.

Employees who are asked to make a facilitation payment should report this to their line manager with a description of the circumstances in which the payment was requested. The manager should then immediately report the facilitation payment request to the business area manager if the request

pertains to one of Storskogen's subsidiaries. Otherwise the request should be reported to the person responsible for regulatory compliance.

#### 4.2.4 Public-sector operations

It is prohibited to provide, promise or offer a benefit to a party that exercises public authority or makes decisions regarding public procurement tendering. The benefit does not need to be provided to the party determining the exercise of public authority or public procurement tendering in order to be prohibited. The benefit may also be aimed at someone else, e.g. persons closely connected with the recipient. If the benefit is aimed at a party with indirect influence over the decision by preparing or reporting on the matter so that he or she can influence a decision or action through the exercise of public authority or public procurement tendering, the practice may be a criminal offence of trading in influence. When inviting public-sector customers to events, it should be made clear in the invitation that it is assumed the invitation will be checked with the customer's own anti-corruption policy.

#### 4.2.5 Private-sector businesses

It is permitted to provide, promise or offer a benefit to employees or contractors in a privately owned company, if:

- (a) it is done transparently,
- (b) the benefit is moderate, and
- (c) the benefit is not, in other respects, such that it may be regarded as influencing behaviour, i.e. influences or risks influencing the recipient's decisions or way of carrying out their work duties.

The requirement for transparency means that a benefit should usually be aimed directly at the other company, be approved by the company or be consistent with the company's established policy on the issue of benefits. The requirement for moderation means that the benefit may not appear to influence the behaviour of the recipient.

If several benefits are offered to the same employee or contractor, the benefits should be assessed jointly. A benefit that on its own is moderate is not moderate if, together with other benefits, when aimed at the same recipient, it increases the risk of the recipient being influenced in their work or assignment.

Events are generally aimed at many people and there is broadly less risk of the offer being regarded as prohibited if it is aimed at most people in the other company than if an equivalent offer were aimed at a restricted group of people. An event that is aimed at a large group of people and of benefit for the work of the people attending the event and in other respects does not appear extravagant, is therefore usually permitted.

#### 4.2.6 Red flags

The following situations always require particular caution and a discussion of the situation's appropriateness under this anti-corruption policy should be held with the line manager. The list provides examples and is not exhaustive.

- (a) the benefit is of high value or is provided frequently,
- (b) an employee or contractor is offered goods or services that can be used privately,
- (c) the benefit coincides with business negotiations with the recipient's employer or client,
- (d) the benefit (of an event-based nature or similar) is aimed at specially selected people,
- (e) the benefit is not known by the recipient's manager,
- (f) the benefit is initiated by the recipient,
- (g) the benefit differs from standard forms of business relations, or
- (h) the benefit also includes an invitation for a companion, such as a relative or friend.

#### 4.2.7 Legitimate benefits

Benefits may be provided within the scope of 'normal business relations'. However, benefits may never be given to persons who exercise public authority or make decisions on public procurement tendering as per Section 4.2.4 above.

##### (a) Gifts

- A gift of moderate value may be given to a business contact, provided it does not influence the recipient's business decisions. Note that what is moderate or not may vary depending on the company and sector.
- When applying the rule in this point, the value of repeated gifts to the same business contact over a period of less than six months is combined.

##### (b) Dinners and hospitality events

- The purpose of dinners and other entertainment events should be to create and maintain good business relationships. It should be a natural and beneficial part of work and mainly be used for the purpose of work, such as work lunches.
- Invitations for dinners and other entertainment events may only be provided if they involve normal dinners and/or if the event is moderate and aimed at a large group of people and not at specially selected people.
- The recipient's employer should be informed of the invitation, in advance if possible, for example by sending a copy of the invitation to their superior.
- Repeated invitations to the same person over short periods of time should be avoided.
- Dinners and other entertainment events, apart from normal working meals, should be avoided in connection with business negotiations.

##### (c) Travel, study visits, training courses, conferences and sales promotion events

- Travel, study visits, training courses, conferences and sales promotion events are permitted if they form a natural, useful part of the exercise of duties.
- A core requirement is for the content to be meaningful and there is an established programme that is set out in the invitation. Work should be the main feature of the trip and there should only be limited scope for entertainment and leisure.
- The invitation should be aimed at a large group of people and not to specially selected people.
- The recipient should pay travel and accommodation costs.
- The recipient's employer should be informed of the invitation, in advance, for example by a copy of the invitation being sent to their superior.

#### 4.2.8 Receipt of benefits and advantages

This policy's content regarding the possibility of giving benefits also applies, of course, the other way round regarding our receipt of benefits. Employees shall report benefits that might deviate from this policy. If an employee in one of Storskogen's subsidiaries believes that a benefit offered may be prohibited, they should either turn it down immediately or, before accepting it, have it assessed by the respective subsidiary's CEO. Otherwise, employees should contact the responsible for regulatory compliance. In unforeseen circumstances or situations that arise suddenly, where an immediate rejection of the benefit is not possible as it could damage the relationship between the companies, the benefit should be reported to the recipient's employer or client as soon as circumstances allow so that they know about it and can handle it.

## 5 Responsibilities and reporting

All Storskogen employees are personally obliged to comply in all respects with laws, regulations, government authority requirements and guidelines on corruption, bribery and hospitality. The giving

and taking of a bribe are a criminal act and is punishable by law with fines or a prison sentence. Breaching applicable policies could lead to disciplinary consequences. It is ultimately managers within Storskogen who are responsible for ensuring guidelines are communicated to employees and relevant external parties to promote wider knowledge and use of the policy.

All employees are responsible for reporting circumstances that could conflict with this anti-corruption policy or other criminal behaviour to their line manager. If for any reason you do not feel comfortable talking with your manager, or if despite having reported the issue or made a complaint you feel it has not been taken seriously, you can always contact a member of Storskogen’s group management or report your issue through Storskogen’s external whistleblower function, which allows you to make an anonymous report: <https://report.whistleb.com/storskogen>.

## 6 Contact information

Each subsidiary’s CEO is responsible for the general oversight and implementation of this policy in their business. Louise St Cyr Ohm, General Counsel, is responsible for regulatory compliance and is responsible for Storskogen’s compliance with this policy. If you have any questions or require further assistance, please contact Louise via e-mail at [code@storskogen.com](mailto:code@storskogen.com).

## 7 Exemptions

No exemptions from this policy are allowed. Any granting of exemption from this policy would require a documented decision from the Board of Storskogen Group AB (publ). Deviation from this policy is only made in exceptional circumstances and the reasons must be documented in each case. Deviations are never possible for benefits that are against the law. Breaching this policy may result in disciplinary measures that could lead to personal consequences such as termination of employment, legal action or a requirement to pay damages.

## 8 Related documentation

- Storskogen Code of Conduct

## 9 Version history

This policy should be reviewed annually and updated as required or when significant changes are made to sustainability-related work.

Version	Revision date	Description of changes	Author	Approved by	Date of approval
1.0	15/05/2020	Updated in line with the Board’s comments	Louise St Cyr Ohm	Storskogen Board	25/05/2020
1.1	08/10/2020	Updated with information about a new Business Code	Louise St Cyr Ohm	N/A	N/A
1.2	12/05/2021	Updated for international use, format changes	Amelie Nordin	Storskogen board	2021-05-12
1.3	18/10/2023	Minor corrections on contact details for questions	Louise St Cyr Ohm	Storskogen Board	2023-11-06