

AB Sagax

Anti-corruption policy

Adopted by the Board of AB Sagax on 8 May 2025

The basis of the policy is that Sagax must never be involved in or permit corruption. Corruption refers to someone abusing their position for personal gain or undue advantage.

Nor will the company accept that employees allow themselves to be bribed or receive gifts that could be equated with bribes.

1. No company or employee in the Sagax Group, regardless of the market that the company operates in, is permitted, in any way, to encourage corruption by providing or accepting gifts, cash or other forms of compensation that are neither legal nor morally defensible.
2. The value of any provided gift must always be in accordance with applicable legislation and never exceed SEK 1,000 except under specific circumstances. Such exceptions must always be approved by the CEO of AB Sagax.
3. No employee at AB Sagax may accept gifts in excess of SEK 400 from business contacts in the form of presents. Accepting gifts in the form of travel, services and so on is never permitted.
4. Depending on the nature and scope of the violation, employees who contravene the company's anti-corruption policy may be reported to the police.
5. Violation of the anti-corruption policy constitute grounds for dismissal by the company.
6. In case of any uncertainty, employees are required to contact the CEO of AB Sagax for approval.

Scope and responsibility for the policy

This policy applies to all employees and encompasses all aspects of Sagax's operations.

The Board of Directors is responsible for establishing the policy and conducting an annual review to assess its continued relevance, making revisions as necessary.

The Chief Executive Officer (CEO) is responsible for ensuring that the policy is effectively communicated to all employees and that the organization is adequately informed about its content and implications