

AB Sagax

Anti-Corruption Policy

Adopted by the Board of Directors of AB Sagax on 8 May 2026

Core principles

Sagax shall never participate in corruption or permit corruption. Corruption means that someone abuses their position for personal gain. The company will also never accept employees allowing themselves to be bribed or receiving gifts that may be likened to bribes or improper benefits.

Fundamental prohibitions

No employee or representative of Sagax, regardless of the market in which the employee or representative operates, may directly or indirectly:

- offer, promise, provide or receive improper benefits
- use a third party to circumvent this policy
- participate in actions that contravene applicable law or sound business practice

Gifts

- Gifts must always have a legitimate business purpose and be moderate.
- The value of any gifts given shall always comply with applicable legislation and shall never exceed SEK 1,000 unless special reasons exist. Such reasons must always be approved by the CEO of AB Sagax.
- No employees of AB Sagax may receive gifts exceeding SEK 400 from business contacts in the form of presents. Gifts in the form of travel, services or otherwise may never be given or accepted.

Hospitality and entertainment

- Hospitality and entertainment (e.g. meals, events) shall be commercially justified, moderate and have a clear connection with the operations.
- Luxury or frequent hospitality and entertainment shall be avoided.
- Travel, accommodation or participation in events paid for by an external party may not be accepted without special approval from the CEO.

Reporting and compliance

- Suspected breaches shall be reported to the immediate manager, the CEO or via Sagax's whistleblowing service.

This document is an in-house translation of the Swedish policy. In the event of discrepancies, the Swedish original will supersede the translation.

- Breaches of this policy may lead to disciplinary measures, termination of employment and/or a report to the police.
- In case of doubt, employees shall always refrain and contact the CEO for guidance and approval.

Scope and responsibility for the policy

This policy applies all employees and all parts of Sagax's operations.

The Board of Directors adopts the policy, conducts a recurring annual assessment of whether the policy is up to date, and decides on any revisions.

The CEO ensures that this policy is communicated and that the organization has sufficient information about its content and meaning.
