

ANTI-CORRUPTION POLICY

TROAX GROUP



OUR COMMITMENT

Troax Group AB maintains zero tolerance for bribery and all other forms of corruption. Every employee must conduct activities with the highest level of integrity and transparency, in line with our Code of Conduct, applicable laws and this policy. Corruption undermines fair competition, damages our customer relationships and harms our reputation. We are committed to upholding and safeguarding these values through consistent compliance.

OUR PROMISE

Troax Group AB and its subsidiaries undertake to comply with our anti-corruption policy and the anti-corruption laws of the countries where we operate. This means:

- Responsibly and lawfully handling gifts and hospitality.
- Ensuring transparency and proper documentation of all transactions.
- Proactively identifying and managing corruption-related risks.

SCOPE

This policy applies to all companies and employees within Troax Group and its subsidiaries, in every region where we operate, including employees, managers, board members and external business partners. It covers situations that may be affected by corruption, underscoring our collective responsibility to uphold our principles and our pledge.

OUR PRINCIPLES

Troax Group AB is committed to acting with integrity, honesty, and transparency in all our business relationships. We believe in fair and ethical competition, and we reject corruption in all its forms.

Our principles include:

- The policy applies to everyone without exception, regardless of situation or context.
- A culture where responsibility and personal accountability for actions are highly valued.
- Transparent business practices and communication.
- Respect for and compliance with all relevant laws and regulations.
- If corruption is discovered, quick and fair action will be taken, including disciplinary action up to and including dismissal.
- Employees and business partners must avoid any situation where personal interests could conflict with, or appear to conflict with, the interests of Troax Group AB and its subsidiaries.
- All compensation, such as discounts, commissions, and bonuses, must be documented and commercially justified.
- Troax Group AB and its subsidiaries are non-political and do not make political contributions.
- Charitable contributions must be for legitimate purposes.
- Rigorous scrutiny before acceptance or distribution of gifts over a symbolic value, set at 50 euros, with mandatory consultation with the immediate supervisor.
- Mandatory review of all potential intermediaries for Troax Group AB and its subsidiaries.
- Intermediaries are considered, for example, agents, distributors, resellers, service providers, and anyone else engaged or instructed to act for or on behalf of Troax.

GOALS

- Train 100% of all employees in anticorruption and bribery topics by 2025 and maintain continuous training and compliance beyond 2025.
- Complete risk due diligence on 100% of new intermediaries before contract signing by 30 June 2025.

RESPONSIBILITIES

CORPORATE MANAGEMENT

Responsible for establishing, implementing and maintaining this policy, ensuring it is communicated and understood throughout the organization, and allocating adequate resources for anti-corruption compliance.

CFO

Responsible for implementing and enforcing this policy and for ensuring a system exists so Troax can assess, control and evaluate intermediaries.

MANAGERS AND LEADERS

Responsible for ensuring their employees are aware of this policy and receive sufficient anti-corruption training.

EMPLOYEES

Responsible for acting responsibly and in accordance with this policy.

DEVELOPMENT AND PROGRESS

We will regularly review and update our anti-corruption policy to align it with current legislation and best practice. We will measure compliance through feedback and monitoring and will communicate our progress openly.

DIALOGUE AND FEEDBACK

Troax fosters an open dialogue and welcomes feedback from all employees and external stakeholders to continuously improve our anti-corruption policy and practices. Questions, suggestions, or reports of suspected violations can be directed to a manager, the HR department, complianceofficer@troax.com, or submitted through our whistleblower function. All reports will be treated with the utmost confidentiality. Troax ensures that individuals who raise concerns in good faith are protected against retaliation, in accordance with applicable laws and company policy.

EVALUATION OF INTERMEDIARIES

All potential intermediaries of Troax Group AB and its subsidiaries must undergo a review so we can be sufficiently certain of who the intermediary is, what underlying interests may exist and whether we can trust the intermediary not to act corruptly. Intermediaries include agents and distributors, as well as other persons appointed by Troax to act on the company's behalf for a specific matter and to whom Troax provides money or other assets.

The CFO is responsible for ensuring a system exists so Troax can assess, control and evaluate intermediaries.

ACTION PLAN

To implement this policy effectively, Troax Group AB and its subsidiaries will:

- Conduct regular training and awareness programs for all employees.
- Include this policy in the introduction program for all new employees.
- Maintain a reporting system for potential breaches through our [Whistleblower process](#).
- Perform risk assessments to adjust our policy and control mechanisms.
- Provide resources and support for policy compliance by employees & third parties.

COMPLIANCE CHECKLIST

To support our daily compliance, all companies within the Troax Group will implement the processes and training required for compliance with this policy and local anti-corruption legislation. Troax encourages its companies to adopt checklists in their daily work that cover issues related to anti-corruption in connection with transactions, gifts, representation, and interactions with suppliers and customers. This checklist serves as a reminder and guide to ensure that our actions always reflect our commitments to integrity and fairness.

TRANSACTION CHECKLIST:

- Is the transaction transparent and correctly recorded?
- Are the prices and terms clear, reasonable, and within market standards?
- Have I avoided undocumented verbal side agreements?

GIFTS AND HOSPITALITY CHECKLIST:

- Is the gift of symbolic value and not cash or equivalent (50 euros)?
- Does the hospitality align with the norms of common business ethics?
- Could this be perceived in any way as a bribe or inappropriate influence?

INTERACTION WITH SUPPLIERS AND CUSTOMERS CHECKLIST:

- Have I conducted the necessary due diligence on the supplier/customer?
- Am I avoiding conflicts of interest and reporting any that arise?
- Am I making decisions based on the best interests of Troax Group and not personal gain?

GENERAL SIGNALS THAT SHOULD WARN YOU TO QUESTION THE SITUATION:

- "No one will ever find out."
- "Everyone does it."
- "We can hide it."
- "We haven't had this conversation."
- "It doesn't matter how it's done, just that it gets done."

If you're ever in doubt about how to proceed or interpret any part of this policy, always consult with your manager.

Martin Nyström, CEO



TROAX GROUP