



# ANTI CORRUPTION POLICY

VERSION 2024

**Our commitment:**

Troax Group AB exercises a zero-tolerance policy towards bribes and other forms of corruption. We expect that all our employees conduct their activities with the highest degree of integrity and transparency, in accordance with our Code of Conduct, applicable laws, and this policy. Corruption harms fair competition, damages our relationship with customers and tarnishes our reputation. Our commitment is to maintain and protect these values through consistent compliance.

**Our principles:**

Troax Group AB is committed to acting with integrity, honesty, and transparency in all our business relations. We believe in fair and ethical competition and 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.
- 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 representatives for Troax Group AB and its subsidiaries. Representatives are considered, for example, agents, distributors, resellers, service providers, and anyone else engaged or instructed to act for or on behalf of Troax.

**Our promise:**

Troax Group AB and its subsidiaries commit to adhering to our anti-corruption policy and the laws combating corruption in the countries where we operate. This means:

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

**Who does what:**

The policy covers all companies within Troax Group AB, including its employees, leaders, board members, and external partners. It applies in situations that may be affected by corruption, emphasizing our collective responsibility to uphold our principles and our promise.

**Development and progress:**

We commit to regularly reviewing and updating our anti-corruption policy to align it with applicable legislation and practices. We will measure the policy's compliance through feedback and monitoring, with a promise of open communication about our progress

**Action plan:**

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

- Conduct regular training and awareness programs for all employees.
- Include this policy in the induction program for all new employees.
- Maintain a reporting system for potential breaches through our whistleblower system.
- Perform risk assessments to adjust our policy and control mechanisms.
- Provide resources and support for policy compliance by employees and third parties.

**Dialogue and feedback:**

Troax encourages open dialogue and values feedback from all employees and external stakeholders on how we can improve our anti-corruption policy and practices. Questions, suggestions, or reports of suspected violations can be directed to a superior, the HR department, or directly to our Compliance Officer. We guarantee confidential treatment of all information and protection for those who report in good faith.

**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?

**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."

**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?

**Gifts and hospitality checklist:**

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

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Thomas Widstrand, CEO

