



Anti-corruption policy

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Responsible for policy: CEO

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1. Introduction

At Storskogen, we have zero tolerance for corruption and bribery. Our anti-corruption policy complies with Swedish and international laws as well as standards such as the Business Code and the UN Global Compact. Through this policy, we forbid all forms of corruption, including bribery, conflicts of interest, and improper business conduct.

2. Purpose

This policy aims to provide clear guidelines for preventing and managing corruption, bribery and conflicts of interest within the Storskogen Group and our subsidiaries. By preventing these irregularities, we strengthen our business ethics and protect both our business and our reputation.

3. Scope

The policy applies to all employees, consultants, executives and board members within the Storskogen Group and its subsidiaries, regardless of geographical location.

3.1. Adaptation for subsidiaries

All subsidiaries within Storskogen shall implement this anti-corruption policy as a minimum requirement and comply with relevant national and local laws, where stricter laws always take precedence. Each subsidiary shall:

1. **Comply with minimum requirements:** Ensure compliance with Storskogen's anti-corruption principles, which include regular risk assessments, incident reporting and training for employees in risk positions.
2. **Local adaptation:** Adapt the policy to the local conditions without deviating from Storskogen's overall goal of zero tolerance for corruption.
3. **Proportionate application:** Companies must adapt their anti-corruption measures according to their size, the risks of their business and the resources available, but always comply with minimum requirements.

4. Definitions

Corruption: Any form of unethical or illegal behavior in which a person abuses their power or position for personal gain.

Bribery: Offering or receiving an improper advantage in exchange for influencing decisions or actions.

Facilitation payments: Small payments to expedite an administrative service or process from government agencies.

Conflict of interest: When a person's personal interests clash with the company's interests and can influence business decisions.

The Business Code: More information about benefits in the business sector can be found in the Business Code, which is available at www.institutetmotmutor.se.



5. Governance and responsibility

Anti-corruption work in Storskogen is governed by the following principles:

- **Monitoring and reporting:** The board has the ultimate responsibility for monitoring compliance with the policy and ensuring that deviations and incidents are handled correctly.
- **Risk management:** We conduct regular risk assessments to identify and prevent potential corruption risks in all business areas and relationships.
- **Training:** All employees in high-risk positions undergo regular anti-corruption training to ensure they understand the policy and know how to act in risky situations. The focus is on providing practical examples and clear guidelines to avoid corruption.
- **Internal control:** Management is responsible for establishing and maintaining internal control systems that ensure compliance with policies and laws. This includes regular audits and improvements to processes to detect and prevent corruption.

The roles for the implementation and monitoring of the policy are distributed as follows:

Role/Title	Responsibility
Group Board	Has the ultimate responsibility for approving and monitoring compliance with the anti-corruption policy across the Group
CEO	Responsible for implementing the policy and ensuring its compliance at all levels of the Group and reporting to the Board of Directors
Subsidiary CEOs	Ensures that the policy is implemented and followed within the subsidiary. The CEO of the subsidiary is also responsible for ensuring that adequate control systems are in place and that relevant employees are trained in anti-corruption.
Subsidiary Boards	Monitors and ensures that the policy is complied with within each subsidiary and that the necessary resources are available to minimize corruption risks. The Board also receives and reviews reports on any incidents.
Collaborator	All employees are obliged to comply with the policy and report any incidents or violations of the law or policy, either to their immediate manager or via the whistleblower function.



6. Our commitment

Storskogen undertakes to comply with international standards and applicable laws in each country in which we operate. We have zero tolerance for both bribery and corruption, which means that no improper benefit may be offered, received or requested to influence business decisions. All decisions must be made in Storskogen's best interest. We also work actively to minimize the risk of conflicts of interest.

7. Anti-corruption in practice

Storskogen prevents and manages corruption and bribery through the following steps:

1. Risk assessment and evaluation:

- Regular risk assessments are carried out to identify corruption risks in business relationships and transactions.
- The risk of corruption shall be evaluated in each business relationship, based on factors such as the business partner's business, geography and representatives.
- Each subsidiary must identify its specific risks and, if necessary, take measures to eliminate them.

2. Incident reporting and investigation:

- All suspicions of corruption must be reported immediately to the immediate manager or responsible for compliance.
- Incidents are investigated and appropriate measures are taken to prevent future incidents.

3. Training and skills:

- Regular anti-corruption training is held for employees. All employees in high-risk positions, such as sales, purchasing and management teams.
- The subsidiaries are responsible for adapting the training to local risks and business scenarios.

4. Acceptable Behavior and Guidelines:

All forms of benefits, gifts and hospitality should be moderate and transparent. They must never influence business decisions. See Guidelines in Appendix 1 for examples.

8. Targets, monitoring and reporting

Storskogen sets annual targets to minimize corruption risks. These are followed up, analyzed and reported in the annual report.

9. Compliance

All employees are expected to comply with this policy. In the event of violations, disciplinary measures may be taken. Employees can report anonymously via

<https://report.whistleb.com/storskogen>.



10. Version history

This policy will be reviewed annually and updated as necessary or when there are major changes in the work linked to sustainability.

Version	Revision date	Amendment description	Author	Approved by	Approved date
1.0	2020-05-15	Updated according to the board's comments	Louise St Cyr Ohm	Storskogen's Board of Directors	2020-05-25
1.1	2020-10-08	Updated with information about the new Business Code	Louise St Cyr Ohm	N/A	N/A
1.2	2021-05-12	Updated format, minor corrections and internationalized	Amelie Nordin	Storskogen's Board of Directors	2021-05-12
1.3	2023-10-18	Minor corrections about who an employee should turn to.	Louise St Cyr Ohm	Storskogen's Board of Directors	2023-11-06
1.4	2024-10-18	Format reworking and simplification	Louise St Cyr Ohm/ Amelie Nordin	Storskogen's Board of Directors	2024-11-06



Annex 1 – Guidelines for receiving and providing benefits

Unfair advantages

Examples of improper benefits include:

- **Monetary gifts:** Cash or gift cards comparable to cash.
- **Money loans or collateral:** Preferential loans or forgiveness of debts that are not in line with market conditions.
- **Works and services:** Private services on terms that are not in line with market conditions.
- **Conditional benefits:** Benefits with a requirement for consideration that is not approved by the recipient's employer.
- **Private use:** Benefits such as the disposal of a vehicle, boat, holiday home or similar for private use.
- **Paid pleasure or leisure trips.** Trips that are paid for private pleasure and do not have a business purpose.

Facilitation payments

Storskogen does not accept *facilitation payments*. These payments may include:

- Processing of government documents
- Issuance of licenses or permits
- Customs clearance of goods
- Obtaining appropriate police protection or other routine measures

Employees who are asked to make a *facilitation payment* must immediately report this to their immediate manager. The manager is responsible for documenting the incident and reporting it to the business area manager in the case of a subsidiary, or to the person responsible for regulatory compliance in central functions. Storskogen strives for full compliance with our ethical guidelines and counteracts all forms of improper payments.

Public sector

It is forbidden to offer or receive benefits that may affect the exercise of public authority or public procurement. This includes not only the direct decision-maker, but also relatives or others with influence.

Private business

Benefits in private business relationships are allowed if they:

- **Are transparent and approved** by the recipient's company.
- **Are moderate** and do not influence business decisions.
- **Not be combined with other benefits** so that they can appear to affect behavior.

Warning flags

Be especially careful in the following situations:



- Benefits of high value or that are given frequently.
- Privately useful benefits (goods or services).
- Benefits provided in connection with business negotiations.
- Benefits that are unknown to the recipient's manager or initiated by the recipient himself.

Legitimate Benefits

- **Gifts:** Moderate gifts are allowed as long as they don't influence business decisions.
- **Dinners and entertainment events:** Should be moderate and have a business purpose. Avoid giving repeated invitations to the same person within a short period of time.
- **Travel and events:** Allowed if they have a clear business purpose and the work element dominates. The recipient must be responsible for travel and accommodation.

Receipt of benefits

The same rules that apply to the granting of benefits also apply to receiving them. If you are offered a questionable benefit, consult with your manager or compliance officer before accepting it.