

Anti-Bribery and Corruption Code of Conduct

Version:	1.0
Applicable from:	January 1, 2022
Scope:	All employees
Responsible persons:	Group Management Group
Approved by:	Board of Directors
Related policies:	Code of Conduct

1 Scope

This Anti-Bribery and Corruption Code of Conduct applies worldwide to Oy Hedengren Ab and its group companies. The principles set out in this document apply to all Hedengren Group employees and third parties working on behalf of the company. All employees have a duty to be aware of the contents of this document and any updates to it, and to comply with the provisions of this document.

This Anti-Bribery and Corruption Code of Conduct is based on Finnish, EU and international (especially UK and US) anti-bribery and corruption regulations. Although there is no actual national regulation on the required measures in Finland, companies are required to take all necessary and reasonable measures to prevent bribery.

Bribery and corruption are illegal in every country Hedengren Group operates and conducts business in. Violations of anti-bribery and corruption regulations may result in fines and/or several years' imprisonment for the employee and the company's management, in addition to termination of employment. Significant fines may also be imposed on the company.

Bribery and corruption are the biggest obstacles to economic and social development worldwide. They disrupt free competition and slow down economic growth. Bribery and corruption erode democracy and undermine justice.

Hedengren Group does not condone bribery or corruption under any circumstances.

The purpose of this Anti-Bribery and Corruption Code of Conduct is to increase employee awareness of the risks associated with corruption, to prohibit corruption and bribery in accordance with the Hedengren Group Code of Conduct, and to ensure that we operate with integrity, according to the highest ethical standards and in compliance with anti-corruption legislation, regulations, and ordinances.

2 Corruption

Corruption as a crime is not included in the Criminal Code of Finland. Corruption refers to abusing the power of a government representative or a civil servant to pursue personal gain. Corruption includes the misuse of funds and the misuse of information for financial gain.

Corruption can be difficult to detect because it involves two or more people, who make a secret agreement and usually not in writing. The illegal agreement can be about a party paying or

giving something of financial value to a civil servant, other representative of a government, a company, or an employee of a company to secure some favor in exchange.

Corruption can also take place through a third party, which still does not make corruption acceptable or legal.

3 Bribery

Bribery is a form of corruption. Bribery refers to giving or accepting money, a gift, or something else of financial value in exchange for the recipient behaving a certain way. Bribery prohibited by legislation may be committed by offering, giving, promising, receiving or asking for anything of value for the purpose of improperly influencing the activities of a civil servant, other representative of a government, or any other person, such as those employed by private companies.

Illegal bribes can take many forms. Money, goods, property, privilege, advantage, promise, a favor, and services can all be considered bribes.

Employees and representatives of Hedengren Group may not offer, give, promise, or authorize the provision of anything of value to a third party to promote or maintain business or obtain any other improper advantage. Employees and representatives of Hedengren Group may not ask, receive, or promise to receive anything of value in return for an inappropriate benefit.

4 Grease payments

Making grease payments is a form of bribery. Grease payments are generally considered prohibited bribes, regardless of their amount or regularity. An example of an illegal grease payment is when money or goods are given to a civil servant or other representative of the government to perform or expedite the performance of their official duties (e.g., processing a case, granting a permit).

Employees and representatives of Hedengren Group are not allowed to make grease payments. If you find yourself in a situation where a failure to make a grease payment would jeopardize the safety of you or your family, you can make the grease payment to avoid immediate danger. In this case, you should, as soon as possible, do the following:

- Report the event to your supervisor and the Group's Managing Director or CFO; and
- Ensure that the payment is properly recorded in accounting.

5 Gifts, hospitality, and payment of expenses outside the Group

Gifts, hospitality, and the payment of other expenses are often seen as a part of normal business relationships. However, in some situations, giving gifts, paying expenses for others, and hospitality may be considered illegal bribes if they are made in exchange of an improper advantage. Gifts, hospitality, and the payment of others' expenses must never influence the recipient's decision-making, or oblige the company, its employees, management, or a third party, including business partners, to do something or not to do something.

To avoid actions that may appear inappropriate, Hedengren Group has adopted a cautious approach to business gifts, hospitality, and paying the expenses of parties external to the company. Therefore, make sure to comply with the following before giving anything of value to a third party:

- Gifts worth more than €200, both given and received, must always be approved by a member of the Management Group.
 - For other gifts, the approval of a supervisor is required.
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- We always pay for our own plane tickets.

6 Recruitment

Recruiting a person can be considered a bribe if the recruitment results in an improper advantage for the person recruiting the new employee or to the company in general. All recruitments must be made in accordance with Hedengren Group's official recruitment processes. No applicant may be favored or considered at the request of a third party that has the potential to act, upon request, in a way that benefits the company.

7 Donations

Donations to charity can be considered bribes if they benefit someone and the company or individual making the donation receives an inappropriate benefit from it. Donation requests indicating that the company could benefit from the donation must be rejected and reported to the Group's Managing Director or CFO.

8 Group representatives

External representatives of the Group who act on behalf of the Group may subject the Group to penalties and damage our brand and reputation if they act unethically or in violation of this Anti-Bribery and Corruption Code of Conduct. All third parties acting on behalf of and for the benefit of the Group must comply with the Group's Code of Conduct for Third Parties. Before conducting business with a party, the Group's employees are required to follow a due diligence process for third parties to ensure that the parties operate and conduct business ethically.

9 Accuracy and factuality of the accounts

All payments, gifts and other compensations must be recorded accurately, in a timely manner and with sufficient accuracy in the Group's accounts. No undisclosed or unrecorded payments may be made for any purpose. False, misleading, incomplete, inaccurate, or fictitious entries are prohibited.

10 We ask for advice and report suspected violations

It is up to each of us to comply with legislation and this Anti-Bribery and Corruption Code of Conduct.

Supervisors are responsible for ensuring that this Anti-Bribery and Corruption Code of Conduct is complied with in their own team, and the management is responsible for creating an open and encouraging work environment in which employees feel they can raise their concerns and seek advice in situations where they are unsure what the correct actions are.

All employees must immediately report violations of law that they observe or suspect, as well as any violations of this Anti-Bribery and Corruption Code of Conduct or other Hedengren Group rules via

- Hedengren's Whistleblowing notification channel.

This allows issues to be handled and resolved promptly as well as preventing them from happening again in the same unit or elsewhere in the organization.

We investigate the reports made carefully and as confidentially as possible and

process personal data appropriately.

11 Retaliation is not tolerated

Hedengren Group is committed to a strict policy against retaliation. No employee of the Group will be adversely affected if they report a concern about a possible violation of this Anti-Bribery and Corruption Code of Conduct or if they refuse to participate in actions that violate these principles.

12 Penalties for non-compliance

Violations of this Anti-Bribery and Corruption Code of Conduct, failures to report a violation, making a fraudulent report, and retaliatory actions may result in disciplinary action, including termination of employment.

If a Group employee or another representative of the Group violates these principles or legislation, the Group may file a claim for the damages caused by the violation or take action under labor laws, which includes issuing a warning and the termination of employment. It should be noted that violating these principles or legislation may also result in the Group being charged with bribery.
