

Anti-Competitive Policy

TurnMill Group is committed to fair competition and compliance with all applicable competition laws and regulations. We believe that competition benefits consumers, drives innovation, and fosters economic growth. This Anti-Competitive Policy outlines our principles and expectations for preventing anti-competitive behavior in all aspects of our business operations.

Definitions

Anti-competition refers to actions or practices that undermine fair competition in a market, often resulting in unfair advantages for certain participants, reduced consumer choice, and potential harm to economic efficiency.

Prohibited Conduct

- TurnMill Group prohibits all forms of anti-competitive behavior, including but not limited to:
- Collusion with competitors to fix prices, allocate markets, or rig bids.
- Predatory pricing or other tactics intended to drive competitors out of the market unfairly.
- Exclusive dealing arrangements or tying arrangements that restrict customer choice or competition.
- Any other actions that violate competition laws or harm competition in the marketplace.

Compliance with Laws and Regulations

- TurnMill Group is committed to complying with all applicable competition laws and regulations, including but not limited to antitrust laws, competition regulations, and trade practices laws.
- Employees must familiarize themselves with competition laws relevant to their roles and responsibilities and adhere to them at all times.

Training and Awareness

- TurnMill Group provides regular training and awareness programs to educate employees about competition laws, their obligations under this policy, and how to recognize and avoid anti-competitive behavior.

Reporting Violations

- Employees who become aware of any violations of this policy or any suspected anti-competitive behavior

must report them promptly to their supervisor, the MD, or through our anonymous reporting channels.

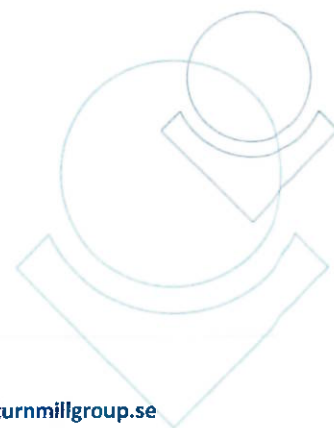
- TurnMill Group prohibits retaliation against employees who report suspected violations in good faith.

Due Diligence

- TurnMill Group conducts due diligence on business partners, including suppliers, contractors, distributors, and joint venture partners, to ensure they adhere to similar anti-competitive standards and do not pose a risk to the company.
- TurnMill Group conducts regular Risk Assessments according to the document “Framework for Business Ethics Risk Assessment”.

Consequences of Violations

- Violations of this policy may result in disciplinary action, up to and including termination of employment.
- TurnMill Group reserves the right to take legal action against individuals or entities involved in anti-competitive behavior.



Governance and Reporting

Adherence to this Anti-Competitive Policy is essential to maintaining the integrity and reputation of TurnMill Group. Every employee is expected to uphold these principles and act in accordance with the highest ethical standards. We will establish mechanisms to monitor and measure the effectiveness of our business ethics efforts and report regularly on our progress and performance. This policy, targets and achievements are reviewed annually by the Board of Directors and quarterly by the Executive Team to ensure target progress and resource allocation.

A handwritten signature in blue ink, appearing to read "Jesper Blomquist".

Jesper Blomquist, MD TurnMill Group AB

Targets

Target	When
Training provided to all relevant staff	2025-01-01
Yearly, documented, Business Ethics Risk Assessment in place	2025-01-01

