

Anti-Corruption Policy

TurnMill Group is committed to conducting its business with honesty, integrity, and transparency. We believe that corruption in any form is detrimental to our reputation, undermines trust, and hinders sustainable development. This Anti-Corruption Policy outlines our principles and expectations for preventing corruption and bribery in all aspects of our operations.

Definitions

- **Corruption:** Any act of bribery, extortion, fraud, embezzlement, or other dishonest practices.
- **Bribery:** The offering, giving, receiving, or soliciting of anything of value to influence a decision or gain an improper advantage.

Prohibited Conduct

- TurnMill Group prohibits all forms of corruption and bribery, whether involving public officials, private individuals, or other organizations.
- Employees are prohibited from offering, giving, receiving, or soliciting bribes or kickbacks in any form, including cash, gifts, entertainment, or favors.
- Employees must not engage in any activities that could create the appearance of impropriety or undermine the integrity of TurnMill Group

Compliance with Laws and Regulations

- TurnMill Group is committed to complying with all applicable anti-corruption laws and regulations in every jurisdiction where we operate, including but not limited to the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.
- Employees must familiarize themselves with anti-corruption laws and regulations relevant to their roles and responsibilities and adhere to them at all times.

Gifts, Entertainment, and Hospitality

- While occasional business gifts, entertainment, and hospitality are common courtesies in many cultures, they must be reasonable, transparent, and not intended to improperly influence business decisions.

- Employees must obtain prior approval from their supervisor or the Compliance Officer for any gifts, entertainment, or hospitality exceeding nominal value.

Due Diligence and Risk Assessment

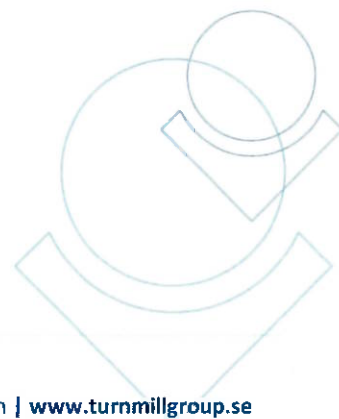
- TurnMill Group conducts due diligence on third parties, including suppliers, contractors, agents, and business partners, to ensure they adhere to similar anti-corruption standards and do not pose a corruption risk to the company.
- TurnMill Group conducts regular Risk Assessments according to the document "Framework for Business Ethics Risk Assessment".

Reporting Violations

- Employees who become aware of any violations of this policy or any suspected corrupt activities must report them promptly to their supervisor, the Compliance Officer, or through our anonymous reporting channels.
- TurnMill Group prohibits retaliation against employees who report suspected violations in good faith.

Training and Awareness

- TurnMill Group provides regular training and awareness programs to educate employees about the risks of corruption, their obligations under this policy, and how to recognize and report corrupt activities.



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 corruption or bribery.

Governance & Reporting

Adherence to this Anti-Corruption 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.



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

