

Anti-Corruption Policy

Corruption essentially means taking advantage of your position to obtain unfair advantage for your own or for someone else's gain, for example, by giving or receiving a bribe or any other improper benefit.

Bulten never accepts any form of corruption and the Group's basic principles are:

- to always follow applicable laws, rules and regulations valid in each country where it operates;
- to never receive, accept a pledge, request, leave, promise or offer a bribe or other prohibited and/or improper benefits of any kind, regardless of form, method or purpose;
- to ensure that the business is characterized by a high level of business acumen, a high degree of integrity and ethics in which every employee is responsible for acting in such a way that confidence cannot be questioned.

Bulten's Anti-Corruption Policy applies in all operations that come under the influence of the Group and shall be applied by all employees, contractors and elected representatives within the Group. Bulten also expects suppliers, business partners, agents and other collaborating partners to apply Bulten's Anti-Corruption Policy or corresponding principles.

Responsibility and reporting

Each manager within the Bulten Group is responsible for ensuring his or her employees read and understand Bulten's Anti-Corruption Policy.

Each employee, contractor and elected representative is responsible for always acting in accordance with the applicable legislation and regulations and this Anti-Corruption Policy. Furthermore, they shall always act in such a way that Bulten's professionalism and objectivity cannot be called into question.

If there is any uncertainty regarding how these guidelines should be applied, firstly contact your immediate manager or superior manager and secondly the SVP HR & Sustainability.

All employees, contractors and elected representatives within Bulten are expected to report behaviour or conduct that is, or may reasonably be considered a breach of legislation, the Code of Conduct, the Anti-Corruption Policy or the Anti-Corruption Guideline. The incident shall be reported to your immediate manager or superior manager or according to local reporting procedures. If there are any questions on the reporting procedures and/or the interpretation of the policy, employees and managers can contact the SVP HR & Sustainability.

Bulten expects managers to take reported incidents seriously and to deal with them in accordance with laws and with Bulten's policies and values.

Bulten will not accept any discrimination or reprisal against employees or elected representatives who in good faith report an actual or suspected infringement.

Follow-up and updating

This policy shall be reviewed and updated as required. The manager of a subsidiary is responsible for ensuring compliance with this policy, and ultimate responsibility lies with the President and CEO. Follow-up shall take place regularly and the SVP HR & Sustainability is responsible for proposing changes to the policy if so required. Changes are to be approved by the Bulten Group management team.

Specific guidelines have been prepared for the implementation of the policy.

Related document:

- Anti-Corruption Guidelines
- Code of Conduct
- Communication Policy