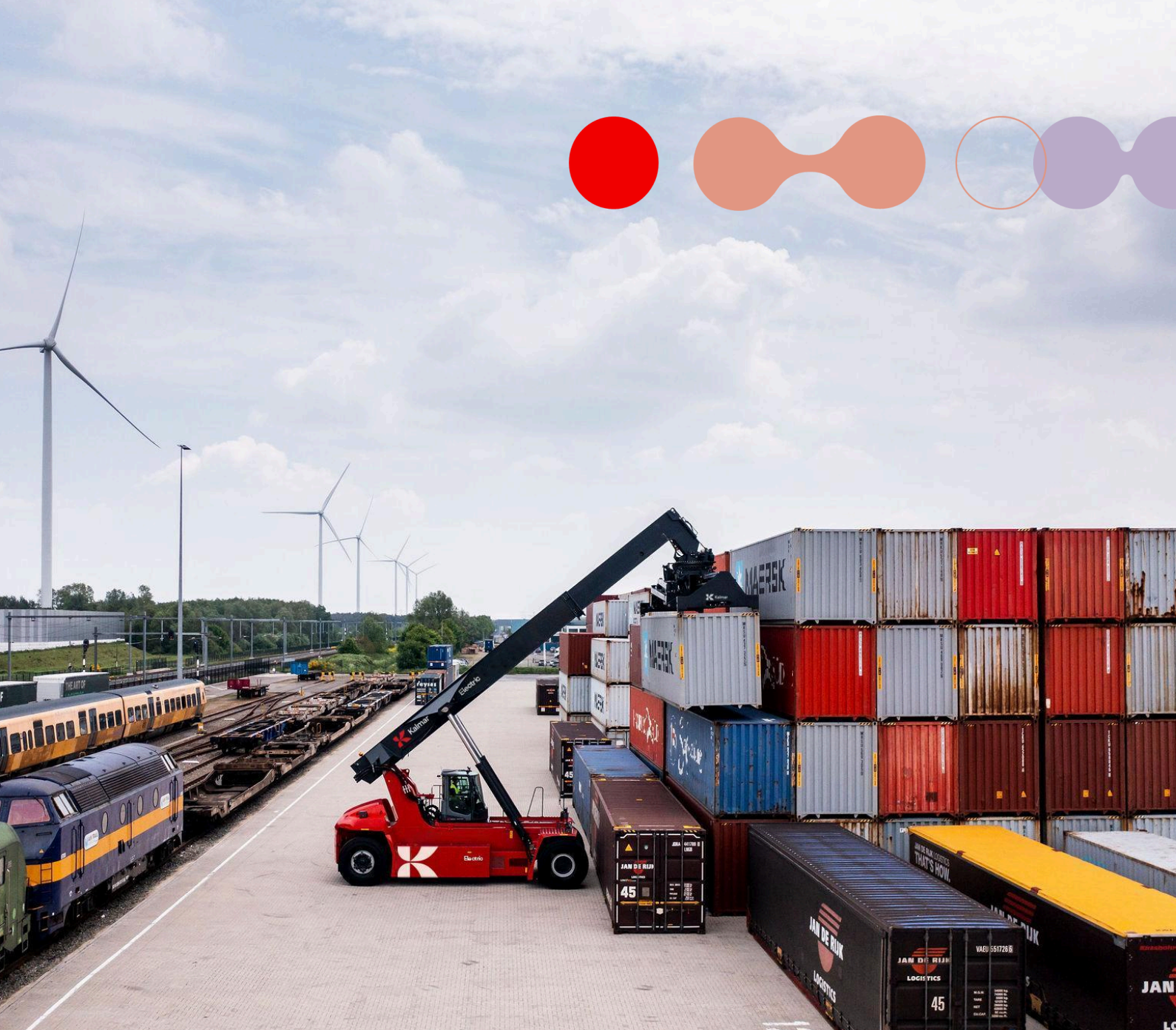




Kalmar Anti-Corruption Policy

Data Classification:
Public

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1. Purpose and scope

At Kalmar, we are committed to the highest level of ethical behavior and do not engage in any form of bribery and corruption. We expect that all employees and business partners will conduct themselves in accordance with our policies, procedures, and the laws relating to bribery and corruption.

The policy applies to all employees and directors of Kalmar as well as to any other people or bodies associated with or acting on behalf of Kalmar, within all regions, areas and functions. This policy should be read in conjunction with Kalmar's Code of Conduct.

2. Definitions

2.1. *Anything of value*

"Anything of Value" means any type of benefit to the recipient. This includes, for example cash, loans, gifts, jobs, tuition, scholarships, entertainment, travel and other contributions. It also covers intangible, non-monetary benefits like hiring someone's relative.

2.2. *Bribery*

"Bribery" means giving, offering, or promising anything of value in order to improperly influence any official action or inaction of the recipient.

2.3. *Corruption*

"Corruption" is the abuse of entrusted power for private gain.

2.4. *Government official*

"Government official" means any elected or appointed official, director, officer or employee of any government – including any department, agency, office or other government institution or organization – or any company that is owned or controlled by a government.

3. Main principles

3.1. *Bribery - zero tolerance*

Corrupt practices, including bribery, are illegal, wrong and forbidden at Kalmar. They distort markets, undermine social justice and facilitate many other types of criminality. Employees and business partners who attempt or engage in bribery expose themselves and the company to serious criminal legal risks. Therefore, Kalmar has zero tolerance for corrupt practices of any kind, whether committed by its own employees or by business partners acting on behalf of Kalmar.

All Kalmar employees and any partners acting on behalf of Kalmar are prohibited from directly or indirectly offering, giving, soliciting or receiving any form of bribe, kickback or other corrupt payment, or anything of value, to or from any person or organization, including government



agencies, individual government officials, private companies and employees of those private companies under any circumstances. This prohibition applies globally irrespective of local customs, practices or competitive conditions.

3.2. Facilitation payments / grease payments / small bribes

Facilitation payments are small bribes paid to government officials to secure or expedite the performance of routine or necessary actions (for example, payments to customs officers to expedite clearance of shipments). Such payments are illegal and prohibited by this policy.

3.3. Gifts, entertainment, and hospitality

Gifts, entertainment and hospitality can be given in appropriate circumstances as per Kalmar's Instruction on Gifts and Hospitality. Any such benefits must always be offered transparently, be of reasonable value, have a legitimate business reason and never be intended to improperly influence any action or inaction by the recipient.

3.4. Business partners / third parties

Under applicable corruption laws, Kalmar may be responsible for the actions of its business partners, especially those that make or facilitate sales to Kalmar's end customers. Such sales business partners include but are not limited to agents, contractors, dealers, distributors and consultants acting on the company's behalf. Improper payments made by any business partner may subject Kalmar to the same liability as if Kalmar had made the payment directly. Therefore, all business partners must only be engaged in good faith, for legitimate and legal purposes and following appropriate due diligence and engagement procedures prescribed for the type of partner.

Please refer to more detailed instructions in the Business Partners Policy, the Business Partners in Sales Instruction, the Sourcing Policy or seek assistance if you're not sure of the applicable procedure.

3.5. Charitable donations, and sponsorship

Charitable donations and sponsorships must only be made as authorized by the Kalmar Delegation of Authority Matrix and only when: (a) the purpose is legitimate, (b) payment will not be diverted to or otherwise benefit someone other than the stated recipient; and (c) the contribution is transparent and will be properly recorded in Kalmar's financial records.

Such contributions must never be made with the purpose or appearance of improperly influencing the recipient.

3.6. Accurate records

All Kalmar employees must ensure that company records are truthful, complete and accurate to the best of their knowledge. Company records include commercial records, such as business correspondence, purchase orders, invoices, quotations, good receipts and similar documents, and



internal records, including financial system entries, records and reports. Kalmar employees must never deliberately falsify, forge or misrepresent any records.

3.7. No retaliation

No employee or any person acting on behalf of Kalmar will be penalized for any delay or loss of business resulting from their refusal to pay or receive a bribe.

Kalmar employees and any person acting on behalf of Kalmar must report any genuine concerns about conduct in breach of this policy. Disciplinary action, including termination, may be taken against anyone who threatens or engages in retaliation, retribution, or harassment of any other person who has reported or is considering reporting an incident in good faith. Please refer to SpeakUp and Non-Retaliation Instruction for more information on Kalmar's policy forbidding retaliation.

4. Anti-Corruption do's and don'ts

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees at Kalmar.

4.1. Never do any of the following

- Offer, give or receive money, gifts or anything of value to improperly win or keep business.
- Offer anything to a government official – directly or indirectly – in return for favorable treatment.
- Conceal the offering, giving or receiving of gifts and entertainment.
- Agree to payment or other terms that are likely to facilitate bribery.
- Encourage or allow an agent, representative or other business partner to engage in conduct that is illegal or prohibited by any Kalmar policy.
- Engage any business partner without following the appropriate procedures for such engagements.

4.2. Always do the following

- Follow Kalmar's Code of Conduct, this policy, and all anti-corruption procedures in your business or function.
- Conduct due diligence when you are selecting and monitoring agents, consultants, suppliers, and other business partners to ensure they are suitable partners for Kalmar.
- Ensure that business agreements are fully recorded in written contracts that include appropriate anti-corruption contractual terms.
- Consult with Kalmar Ethics and Compliance prior to engaging in an activity if you have ethical questions or you are concerned about whether it is illegal or appropriate under this policy.
- Report to Ethics and Compliance if you become aware of or suspect any instance of bribery or corruption by any Kalmar colleague or partner. You may also use the SpeakUp Line (<https://kalmar.speakup.report/global>) that allows for anonymous reporting.



5. Safety / extortion exception

In rare cases, while travelling employees may be subject to illegitimate threats to their safety or liberty unless they make a payment to someone, including sometimes government officers who are abusing their positions. Although every reasonable attempt should be taken to avoid such situations, in cases of credible danger, an exception to the enforcement of this policy will apply.

As soon as possible after the danger has passed and the employee is safe, they must contact their line manager and Ethics and Compliance to describe the incident. Together the incident will be assessed and the appropriate course of action determined. Any expenses born and recorded by the company must accurately reflect the true nature of the payment.

6. Implementation and communication of the policy

It is the responsibility of every employee and leader in Kalmar to follow this policy and ensure its application within their teams. The head of each division and function is responsible for ensuring compliance with the policy within their respective organizations.

The policy is available on Kalmar's Intranet site, Move, and should be made available by Human Resources as needed to employees without access to Move.

7. Approval and review of the policy

The Head of Ethics and Compliance is responsible for maintaining and updating the policy as necessary. The Board of Directors shall approve this policy and any significant changes to it.

Version	Author	Approved by	Date	Comments
001	Kalmar E&C	Board of Directors	1 July 2024	
002	Kalmar E&C	Board of Directors	28 April 2025	* Added section on Safety exception * Removed section on reciprocal agreements * Numerous revisions to clarify text and improve formatting

