

ANTI-CORRUPTION POLICY – PWT GROUP

Our Commitment

PWT Group is committed to conducting all business with integrity, honesty, and transparency. We operate with a zero-tolerance approach to all forms of bribery and corruption and comply with national legislation wherever we do business.

As outlined in our Code of Conduct, we have implemented adequate procedures to prevent corrupt practices in line with the United Nations Convention Against Corruption. We also expect our business partners to uphold similar standards in their own operations.

Who must comply?

This policy applies to all employees and management across PWT Group. Everyone is expected to:

- Read, understand, and comply with this policy
- Refrain from any activity that could result in a breach
- Immediately report any concerns or suspicions to management

Responsibility for implementation

While overall responsibility lies with executive management, the Compliance Team is responsible for day-to-day implementation and monitoring. All managers must communicate this policy to relevant employees and external stakeholders.

What are Corruption and Bribery?¹

Corruption is the abuse of entrusted power for personal gain.

Bribery involves offering, promising, giving, accepting, or requesting anything of value to improperly influence an act or decision. This may include gifts, money, favours, or services.

PWT Group has zero tolerance for any such activities.

Facilitation Payments

Facilitation payments are small, unofficial payments made to secure or speed up routine services (e.g., customs clearance).

If such a request is made, employees must inform their manager immediately and follow the manager's instructions as well as register the incident in the internal record keeping.

¹ Definitions by Transparency International, the leading international NGO in curbing corruption

Gifts and Hospitality

Hospitality is the giving of entertainment and other intangible benefits whether with or without the giving party present, and includes attendance at events, participation in activities, travel, accommodation, etc. The offering, giving and accepting of such, is allowed if:

- They are not intended to improperly influence business decisions
- They do not involve cash or cash equivalents
- They are reasonable and appropriate under the circumstances

Gifts or hospitality exceeding 150 EUR over a 12-month period must be reported to the employee's manager and recorded in the Facilitation and Hospitality Register.

Political and Charitable Contributions

PWT Group does not make contributions to political parties or campaigns.

Charitable donations are allowed if they reflect local needs and are appropriate and they must be registered in the Facilitation and Hospitality Register.

Record-Keeping

All registrations made in the Facilitation and Hospitality Register must clearly state the purpose and nature of the expense.

The Register will be reviewed annually. The data collected will be used for an ongoing evaluation of identifying risk patterns and for developing anti-corruption strategy and actions.

Business Relationships

We will communicate this policy to our business partners and expect them to:

- Understand and comply with this policy
- Prevent and address any form of corruption

If we detect non-compliance, we will:

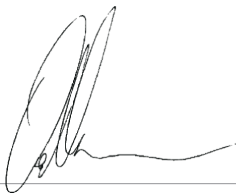
- Use our leverage to influence improvements
- Terminate the relationship if no improvements are made

We avoid working with third parties known for corrupt practices.

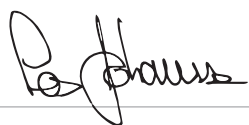
Sanctions and Protection

No employee will be penalized for refusing to pay a bribe—even if it results in PWT Group losing business. Breaches of this policy will not be tolerated and may result in disciplinary action.

AALBORG, MAY 2025



Ole Koch Hansen
CEO



Lars Johansson
Chairman