



GROUP POLICY

Owner
CEO

Valid for
Axis Group

Approved by
Axis AB Board of Directors

Published
2022-03-10

Managed by
Corporate Governance

Security
Public

Group Anti-Corruption Policy



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1 Purpose

Axis has a zero-tolerance policy towards bribery and corruption. Axis observes the highest standards of ethical and business conduct and is committed to combatting all forms of corruption.

Corruption distorts competition, destroys public confidence for institutions, and harms our communities. Any suspicion of corrupt behavior has a detrimental effect on Axis's reputation and brand, and may result in serious consequences for Axis and the individuals concerned.

Thus, the purpose of this policy is to ensure that Axis is compliant with all anti-corruption and bribery legislation, including but not limited to, the Swedish Criminal Code (*sv: Brottsbalken*), the US Foreign Corrupt Practices Act (*the FCPA*), and UK Bribery Act 2010, and follows ethical business conduct. When we refer to Axis in this document, we mean all entities directly or indirectly controlled by Axis AB.

2 Scope

This policy applies to all employees, contingent workers, and consultants, as well as management and board members (each an "Axis Representative") in all of Axis's operations and in all other activities and work connected to, or on behalf of, Axis.

Axis expects all Axis Representatives to promote this policy in all their business relations with business partners. For the purpose of this policy, *business partners* include, but are not limited to, suppliers, sub-suppliers, distributors, system integrators, resellers, and off-site consultants.

Furthermore, Axis expects all business partners promoting the Axis brand or conducting operations on behalf of Axis to comply with the principles expressed in this policy.

3 Main Principles

3.1 Zero-tolerance

For the purpose of this policy, *corruption* is defined as the abuse of entrusted power for private gain. This includes conflict of interest, bribery and illegal gratuities.

Axis Representatives are prohibited from taking part in or contributing to all forms of bribery and corruption.

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Axis Representatives are prohibited from providing money, other assets or anything of value to a business partner representing Axis, in a way that could constitute careless financing of corruption.

No Axis Representative may arrange for Axis to act as an intermediate in respect to money, other assets or anything of value, which may be used in order to gain an undue advantage from any business partner.

All forms of facilitation payments, meaning small payments to speed up routine governmental action, are considered bribes and are therefore prohibited.

3.2 Gifts and hospitality

Gifts and hospitality must be moderate, provided openly and during the natural course of ordinary business.

Axis Representatives do not offer or accept gifts or hospitality with the purpose of encouraging or rewarding a decision, or in order to obtain or retain business.

Please observe the stricter principles for Government Officials in section 3.4.

3.3 Sponsorships, charities and political donations

Axis Representatives are prohibited from providing donations or gifts to political parties or candidates in public elections.

Charitable donations made to organizations in order to obtain or retain business from actual or potential customers with any ties to said organization are also prohibited.

3.4 Government Officials and public procurement

For the purpose of this policy, *Government Official* refers to employees of national, state, provincial, and local governments and all their departments and agencies, at all levels. The term also covers employees of state-owned or state-controlled entities, meaning companies and organizations that may not explicitly be a part of the government, but that are owned or controlled by the government.

No Axis Representative may offer or accept any gifts or hospitality, either directly or indirectly, to or from a Government Official. The only exception is courtesy hospitality of insignificant value.

When taking part in public procurement processes Axis Representatives shall be mindful of the interest in maintaining the integrity of the public authority and the interest of maintaining the general public's trust in the public authorities.

3.5 Conflicts of interest

For the purpose of this policy, a *conflict of interest* may arise when a personal or private interest conflicts, or appears to conflict, with a professional duty.

All decisions and actions by Axis Representatives shall be in the best interest of the company. Axis and Axis Representatives should act in order to prevent conflicts of interest. If conflicts of interest do arise, then Axis and Axis Representatives should disclose, resolve and mitigate the risk of these conflicts arising again.

3.6 Business partner management

Due care is exercised when engaging with business partners and Axis aims to adhere to a risk-based due diligence approach towards all partners present in Axis's value chain.

Axis does not accept business partners who behave in a corrupt manner and will take appropriate action if such conduct is discovered.

3.7 Mergers and acquisitions

Mergers and acquisitions are conducted with due care and are subject to anti-corruption due diligence procedures.

3.8 Accounting and record keeping

All costs related to gifts, hospitality, charitable donations and sponsoring must be accurately recorded and include the appropriate documentation.

Axis Representatives shall only compensate business partners for the actual services performed or goods received and must make sure that invoices are not used to conceal corrupt payments. Compensation in cash is never allowed.

4 Roles and responsibilities

It is every Axis Representative's responsibility to comply with this policy and with all anti-corruption and bribery legislation in the countries where Axis conducts operations. All Axis Representatives are responsible for contributing to the fulfillment of this policy and applying it in good faith when operating on behalf of Axis.

It is every manager's responsibility to promote awareness and compliance with this policy and to ensure that all team members read and receive training in respect to this policy.

Corporate Governance manages the Anti-Corruption Compliance Program.

5 Implementation

5.1 Communication

The latest approved and valid version of this policy is available on the Group Policies page on Galaxis and on axis.com.

5.2 Training

Anti-corruption awareness training is a mandatory part of the onboarding program for all Axis Representatives. Every other year, Axis Representatives are required to complete the anti-corruption awareness training. Additional workshops or other trainings shall be provided for high risk positions.

6 Compliance

Axis Representatives found to have violated this policy risk disciplinary action up to and including termination of employment.

Axis Representatives who suspect violations of this policy are expected to raise the issue with their manager, Corporate Governance, Human Resources or the Axis Management Team. Axis Representatives can also raise concerns in accordance with the Whistleblower Program.

Axis does not accept any retaliation against someone who raises concerns in good faith.

7 Supporting Documents

Axis Group Policy – Code of Conduct