



GROUP POLICY

Owner
CFO

Valid for
Axis Group

Approved by
Axis AB Board of Directors

Reviewed
2024-04-05

Managed by
Corporate Governance

Security
Public

Group Anti-Corruption Policy



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1 Purpose

Axis has zero-tolerance for bribery and corruption and observes the highest standards of ethical business conduct.

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

Thus, the purpose of this policy is to ensure that Axis is compliant with all applicable 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 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 relations with third parties. For the purpose of this policy, *third parties* include, but are not limited to, suppliers, sub-suppliers, distributors, system integrators, resellers, end customers, and off-site consultants.

Furthermore, Axis expects all third parties 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 conflicts of interest, bribery and illegal gratuities.

Axis Representatives are prohibited from taking part in or contributing to all forms of bribery and corruption. In addition, all Axis Representatives must ensure that funds made available to third parties, for example consultants, are not used to finance bribery or other forms of corruption. Therefore, Axis Representatives are prohibited from providing money or other assets to third parties without a clear understanding of what the funds will be used for and who the third party is.



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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 third parties. Furthermore, it is strictly forbidden to arrange for Axis to launder, or support the laundering of proceeds of corrupt practices.

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 have a legitimate business purpose.

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.

All meetings, events, conferences and other visits shall have a clear business agenda reflecting the activities taking place and be accurately recorded.

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

3.3 Marketing activities, sponsorships, and donations

Marketing activities related to Axis' products shall follow industry standards and international best practice.

For the purpose of this policy, *sponsorships* are cash or other support of an activity in exchange for advertising or for the right to participate in a charity event. *Donations* are cash or other gifts, for example end of life products to charities, for which no services or payments are received in return.

To ensure the integrity and legitimacy of sponsorships and donations, all sponsorships and donations must be preceded by proper due diligence and align with Axis Code of Conduct.

Axis and Axis Representatives must never abuse sponsorships or donations to obtain or retain business from actual or potential third parties or end-customers. In addition, Axis and Axis Representatives are prohibited from providing donations or gifts to political parties or candidates in public elections.

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.

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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.

Axis Representatives may not take advantage of the conflicts of interest of others in order to further Axis' business operations.

3.6 Third party management

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

Axis does not accept corrupt behavior from third parties 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 third parties 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 this policy and complete mandatory trainings.

The Axis AB Board of Directors has the overall responsibility for the implementation, compliance with and review of this policy. Corporate Governance manages the Anti-Corruption Compliance Program and reports yearly to the Audit Committee.

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 an 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. In countries where it is allowed, Axis entities, acting employers, should include claw-back provisions in employment contracts with regards to bonuses paid as a result of violations of this policy.

Extraordinary situations may arise where payments are demanded from Axis Representatives under threats of violence, personal harm, or imprisonment. The life and well-being of Axis Representatives are of the utmost importance for Axis and therefore, Axis Representatives may make payments during these exceptional circumstances to ensure their immediate safety or the safety of others.



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Once the initial threat has subsided, the payment must be immediately reported to a manager and to Corporate Governance through anticorruption@axis.com. Any such payments must always be accurately recorded in Axis' books and records. Misuse of this principle may lead to serious consequences for Axis, as well as immediate dismissal for the individuals involved.

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 Group Whistleblower Policy.

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

7 Supporting Documents

Axis Group Policy – Code of Conduct
Group Whistleblower Policy