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Anti-corruption policy

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1 Introduction and Purpose

The purpose of this anti-corruption policy is to set out the rules that apply within A-Train AB ("A-Train") on how we act as an employer and in our business relationships to prevent corruption in all business operations related to A-Train.

A-Train has a zero-tolerance approach to all forms of corruption and shall always work to ensure that its operations are characterized by a high level of integrity and ethics. We shall always inform of any potential conflicts of interest, and we may not use our position to gain personal advantages. Bribery and corruption must never occur in our business relationships. A-Train shall also maintain an open and transparent approach to anti-bribery and corruption.

This policy provides guidance on what bribery and corruption is and how A-Train should act to prevent it. However, this policy is not a complete description of all possible situations and legal issues that may arise. In case of uncertainty or questions, employees are encouraged to consult their superior, who can take the matter further within A-Train or, if necessary, consult legal advisors.

2 Who is covered by the policy?

This policy applies to all employees (including any consultants and/or others acting on behalf of A-Train) regardless of their position, status, or form of employment.

A-Train expects actors with whom A-Train has a business relationship to act in accordance with equivalent principles with zero tolerance for all forms of bribery and corruption. In these business relations, A-Train's Supplier Code of Conduct shall as far as possible be used.

3 What is corruption

Corruption can be described as the abuse of entrusted power or position to gain improper advantage for one's own or someone else's benefit. Corruption can include:

- Bribery and other crimes
- Abuse of power
- Misuse of public funds for private purposes
- Conflicts of interest/cronyism
- Violation of internal regulations and policies

The consequences of corruption for the individual employee can include fines, imprisonment, forfeiture, and trade bans. There may also be tax implications. Employees may also face labour law consequences, such as dismissal.

As regards consequences for A-Train, corporate fines may be imposed. Corruption can also lead to tax implications. A-Train may also suffer damage from negative media attention, loss of contracts, and blacklisting.

The Swedish Anti-Corruption Institute has developed the Code to Prevent Corruption in Business ("**the Code**"), which is a regulatory framework concerning gifts, rewards, and other benefits. The Code is a supplement to law. Companies that comply with the Code are considered acting in accordance with law.

This policy covers giving as well as receiving benefits. Additional caution is to be taken when interacting with representatives of the public sector and benefits to the public sector should be avoided altogether. Always contact your superior if you are unsure how to interpret a situation. Situations other than those described in this policy that fall within the concept of corruption may arise.

4 How do we prevent corruption?

4.1 What can be considered a bribe or constitute corruption?

A first step in preventing corruption is to understand what constitutes a bribe or another type of corruption.

A bribe is an improper benefit that can have either a tangible (financial) or intangible (personal or sentimental) value through which the giver attempts to influence the recipient's actions. A bribe can, for example, take the form of cash, gift cards, goods, services, discounts, travel, loans of money or things, event tickets, sponsorship, commission, employment or assignments, priority in a queue or a prestigious award.

The characteristic feature of a bribe is that it is improper. This means that the purpose of offering or giving a bribe to an employee or contractor is to influence the recipient in a certain direction. This may mean, for example, that a decision is not made on a factual or objective basis or that the recipient does not perform his or her duties in the way that the recipient would typically do without the improper advantage. For a benefit to be considered improper, it is not necessary for someone to receive it. It is sufficient that someone accepts a promise of a benefit. Thus, it may be sufficient that the person promised a benefit does not clearly enough reject or decline this offer.

Whether or not a benefit is considered improper is to be decided based on an overall assessment of all the circumstances of the individual case. This means that a benefit may be assessed differently depending on the job or assignment or depending on who the benefit is intended for. The rules are stricter if the recipient of the benefit is a person exercising public authority or deciding on public procurement.

The value of a benefit is always considered to be the value that the recipient would have paid if he or she had bought it on their own. The fact that the gift does not entail costs for the giver is therefore irrelevant. There are no specific thresholds in the Swedish Penal Code for what is considered to be an improper benefit. The decisive factor is primarily whether the relevant benefit appears so attractive that it can be assumed to have an inherent influencing effect, i.e. that the benefit in a situation is typically likely to evoke feelings of gratitude and of an obligation to repay the benefit. If the recipient has been offered several benefits, e.g. entertainment on several occasions in one year, the total value must be taken into account.

In addition to the giving and taking of bribes, the following are punishable. "Trading with influence", which refers to situations where one person rewards another (e.g. an intermediary) for influencing someone in a decision-making process. It is also a crime to "recklessly finance a bribe". This refers, for example, to situations where an employee would provide money to someone representing A-Train as a business partner, and the money is then used in the giving of a bribe. For liability, it is sufficient that the A-Train employee realized, or knew that there was a risk, that the funding could be used for bribery. Furthermore, "disloyalty to principal" is a criminal offence and refers to situations where

someone has abused a trust given to them by their principal (e.g. A-Train) and taken advantage of their position.

In addition to bribery, facilitation payments can constitute corruption. A facilitation payment is an unofficial payment made to secure or speed up a necessary or routine action to which the payer is entitled. Conflicts of interest or disqualification is another form of corruption, where personal relationships influence or may be perceived to influence a business decision or, for example, an employment decision. In certain cases, corruption may also be present due to sponsorship.

4.2 How can I determine whether something is a bribe or corruption?

It is not possible to clearly state where the line is to be drawn between a bribe or other form of corruption and a permitted benefit. One way to assess whether a benefit is permitted is to ask yourself the following questions:

1. How would the situation be interpreted by others?
2. Can I inform my manager?
3. How would the benefit/offer be viewed if it were to become public (e.g. be reviewed by the media)?

If you cannot answer the above-stated questions or if the answers somehow are embarrassing, you should strongly question the admissibility and appropriateness of receiving, accept a promise of or requesting an (improper) benefit.

Some situations that may arise in daily work are described below. Keep in mind that what applies to offering a benefit to someone outside A-Train also applies in the event that an employee at A-Train is offered a benefit. If possible, benefits should not be offered to an individual, but rather to a larger group of people. As a starting point, all benefits are prohibited when they occur in relation to the public sector (such as authorities and other actors in the public sector) because an action that is permitted in other situations may be prohibited when it occurs in connection to the public sector.

4.2.1 Conflicts of interest/cronyism

If personal relationships can influence or be perceived to influence a business decision (contract with a business partner) or an employment decision, this may constitute a conflict of interest or cronyism. For example, it is not allowed to demand that a relative be offered employment. Employees must be transparent about potential conflicts of interest and disclaim responsibility for decision-making that creates or risks creating a conflict of interest, and always inform their superior if there is a risk of a conflict of interest.

Example: A friend or relative has applied for a job at A-Train. This represents a potential conflict of interest. You should therefore not decide whether your friend or relative should be offered employment, as the decision must be left to someone who does not have a personal relationship with the job applicant. You should also inform your superior about the potential conflict of interest.

4.2.2 Gifts

The giving and receiving of gifts that deviate from what is normal/customary or are of greater value is strictly prohibited within A-Train as they risk constituting bribery. However, limited,

and reasonable gifts and hospitality may in some cases be accepted as a mean to build business relations. This requires that they are transparent, proportionate, reasonable and have a clear business purpose. Gifts may not be exchanged for services. Always inform your superior about gifts.

Example: A supplier personally wants to give you a bottle of champagne worth hundreds of SEK, as a thank you for choosing them in a tender for the goods they provide. You should decline this offer with reference to A-Train's policy that does not allow gifts of greater value. You should also inform your superior.

Moderate expenses related to the promotion of companies (A-Train or our business partners) are allowed. For example, marketing products such as promotional products or product samples are acceptable when offered in the context of a corporate event or company visit, if they are of minor value. Other gifts are only allowed with prior written approval from your superior.

If a business partner or potential customer demands gifts, hospitality, benefits, or personal services before concluding a contract or makes it a condition for further negotiations, this should be directly reported to your superior.

4.2.3 Cash, loans, remission of a claim, guarantees, gift cards or facilitation payments

Regardless of the recipient, giving as well as receiving cash, loans, remission of a claim, guarantees, gift cards or facilitation payments is never allowed within A-Train. All such situations must be reported to your superior.

Example: A traveller offers SEK 500 in cash if we hold the train for five minutes so that his or her friend can make it on the train. You should decline this offer with reference to A-Train's policy that does not allow you to accept bribes. You should also inform your superior as soon as possible.

4.2.4 Performance of services

Regardless of the recipient, working on the recipient's premises or providing goods or services for private purposes and on non-market terms is never allowed within A-Train. This includes, for example, when a service or product is discounted in order to gain an improper advantage. Hidden commissions or kick-backs to employees or contractors are also prohibited.

Example: A supplier offers to let you buy a good or service for private use at "cost price" provided that A-Train buys the supplier's goods or services. You should decline this offer with reference to A-Train's policy that does not allow you to accept any form of compensation, even indirectly. You should also inform your line manager at once.

4.2.5 Business entertainment, meals, and travel

All business entertainment must be exercised with restraint and judgment/discretion. Business entertainment is only allowed if it is directly related to A-Train's business operations.

A business trip must have a clear connection to and form a natural and useful part of the recipient's work. This means, for example, a study trip where a work-related program constitutes an essential element. Furthermore, the trip must not be considered extravagant and must be carried out in accordance with the requirements of transparency and moderation.

Pleasure travel, as well as travel with a predominantly entertainment content, is always prohibited within A-Train. Travel abroad and travel where you pay a "cost price" shall, as a starting point, be considered contrary to this policy unless the circumstances of the particular case allow for a different assessment. The same applies to travel for any of A-Train's employees.

It is not allowed to accept or make an offer for the private use of a vehicle, boat, holiday home, or similar.

Example: You have a [contract follow-up] with a supplier. At the meeting, you discuss vacation plans and the supplier offers you the use of his or her vacation home for a week. You should decline this offer with reference to A-Train's policy that does not allow you to accept private benefits. You should also inform your superior without delay.

4.2.6 Events

Corporate events, such as seminars or courses, must have a legitimate business purpose. At corporate events, elements of entertainment should be kept to a minimum. The event should be business relevant and of service to all participating parties. The event must not be considered extravagant or go beyond what can be considered moderate. The invitation must be transparent. As a general rule, the offer is less likely to be considered improper if it is addressed to a larger group of people than to fewer people.

An invitation to an event organized by A-Train must be designed in such a way that the legitimate business purpose is evident. The invitation should state that by accepting the invitation, the recipient confirms that the participation is in line with the applicable corporate policy and that the participation has been approved by the recipient's employer. In the same way, employees of A-Train may only accept similar invitations if participation is approved and in compliance with this policy.

4.2.7 Sponsorship

Before a charitable contribution or sponsorship is made to a person, company, or association with links to the public or private sector, written prior approval is required from the CEO. Sponsorship must never coincide with the exercise of public authority (such as an ongoing case of, e.g., public procurement or other governmental decisions, business negotiations, or legal proceedings).

5 Compliance with the anti-corruption policy

5.1 How am I to act if I suspect bribery?

If you suspect that you have been offered an improper benefit (bribe), that your colleague has committed a bribery offence, or if you suspect any other type of corruption, you should

either inform your superior or the Head of Security or report it anonymously through A-Train's whistleblowing system.

5.2 Internal procedures for approval

Each employee is responsible for obtaining written approval from his or her superior or other person appointed as responsible within A-Train when required.

All expenses for business entertainment, gifts, hospitality, and benefits should be transparently recorded in the company's accounts and should be certified and managed in accordance with established procedures.

5.3 Responsibility for information on and monitoring of these guidelines

A-Train's management and HR manager shall ensure that all employees receive information on these guidelines at the beginning of the employment and thereafter on a regular basis.

Each employee has a personal responsibility to understand and comply with this policy and is required to report potential risks and suspected corruption and bribery offenses that he or she discovers. A-Train encourages its employees to make suggestions for improvements to further develop and streamline these guidelines.