

Anti-Bribery and --- Anti-Corruption Policy

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Anti-Bribery and Anti-Corruption Policy

Introduction

Columbus will not tolerate corruption, money laundering, fraud, bribery or other illegal or unethical business activities.

Our performance and competitiveness are strengthened solely through lawful conduct, and all employees must at all times comply with laws, rules and regulations applicable for Columbus' business.

To support this policy and to prevent corruption and bribery, Columbus has implemented Columbus Authorization and Risk Management Rules (CARMR), which encompass rules on the authorization hierarchy and ensure the senior management's involvement in major contracts and investments.

This policy applies to all people employed by and associated with Columbus A/S, covering all employees, whether permanent or temporary and sub-contractors.

Columbus' Executive Management is overall responsible for ensuring that Columbus' business is conducted in accordance with this policy.

The Anti-Bribery and Anti-Corruption Policy has been approved by the Board of Directors of Columbus A/S and supplements Columbus' Code of Conduct.

Bribery and corruption

Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty.

Bribery may also take place through third parties.

Columbus and its employees should neither offer, promise or pay bribes, nor accept them, nor induce nor allow any other party to make or receive them on their behalf in order to influence a business decision.

Columbus and its employees will not encourage or permit persons associated with it to offer, promise or pay bribes or receive bribes (whether directly or indirectly).

Business gifts and hospitality

Business gifts and hospitality may also be used as bribes.

Gifts are defined broadly and include anything of value given or received from another business-related person or company, including payments, gratuities, discounts, presents, advantages offered.

Hospitality is defined as any travel, accommodation, meals or entertainment.

Gifts and hospitality must therefore be limited to reasonable business-related gifts.

The following is prohibited in Columbus:

- Employees must never offer or accept gifts, business courtesies, hospitality or entertainment from current or potential business partners/customers, regardless of value, if it could be perceived that the gift, courtesy or hospitality is offered in exchange for influencing a business decision.
- Cash gifts are expressly prohibited
- Lavish or inappropriate gifts, hospitality or entertainment is expressly prohibited
- Quid pro quo arrangements are expressly prohibited.

Guidelines in relation to business gifts and hospitality:

- Gifts and hospitality must always be related to business purposes, customary for that business relation.
- Business gifts of modest value may be offered and received in accordance with local practice and national guidelines. There may be some differences in national guidelines across geographies.
- Hospitality of low value, such as a drink, lunch or dinner may be offered to and received from people with whom we do business provided that the intention is to build business relationships and not to obtain an advantage. Where necessary, guidance should be sought from nearest manager as to whether the planned hospitality is proportionate and reasonable.
- Business gifts and hospitality should not be offered too frequently or at an inappropriate time, as this could easily be perceived as an attempt to influence the decision-making process (for instance during negotiations, legal proceedings, etc.)

- Be aware that stricter rules apply in relation to public officials. Never provide any gifts or hospitality to a public official without prior approval by nearest manager, Market Unit Executive or Group Legal, regardless of the value.

Acceptance of business gifts, hospitality or entertainment must never affect or influence business decisions.

Employees offered inappropriate gifts or hospitality should politely refuse acceptance with reference to this Anti-Bribery and Anti-Corruption Policy.

Managers reviewing expense claims should be alert to the provision of gifts and hospitality, that may be construed or may be considered as a bribe.

Donations and sponsorships

It is essential for Columbus to be involved in community and charitable initiatives globally and locally.

However, grants, donations and sponsorships may be perceived as having an undue influence on business decisions. Grants, donations and sponsorships must therefore always be based on objective criteria and be separated from sales and marketing teams.

Charitable donations and sponsorships must always be customary in size and

purpose and must never serve as a way to obtain an advantage. Donations and sponsorships must always be transparent and recorded in Columbus' books. All donations and sponsorships must be approved by Market Unit Executive or Group Management. Donations and sponsorships must never be authorized by persons with regular business interaction with the requesting party.

Conflicts of interest

A conflict of interest occurs in situations where an employee or a person close to the employee (close relatives, friends, etc.) has a personal interest which could compromise the employee's ability to perform on behalf of Columbus.

Situations which may result in potential conflict of interest should be avoided, and Columbus employees should not participate in decisions where there may be a conflict of interest.

In the event of even the slightest risk of conflict of interest, the employee is disqualified from acting on behalf of Columbus, and the situation must be reported to the nearest manager immediately. The nearest manager will then be responsible for handling the matter.

Communication and training

Columbus' Anti-Bribery and Anti-Corruption Policy has been communicated to all

employees. New employees will be briefed as part of the onboarding training.

It is the responsibility of each manager to communicate this policy to external parties working on behalf of Columbus.

It is the personal responsibility of each employee to read and follow the Anti-bribery and Anti-corruption Policy.

The Anti-bribery and Anti-corruption Policy is not exhaustive, and there may be situations where this policy does not provide explicit guidance. In situations where the policy or the law does not provide clear guidance, employees should contact either their nearest manager or Group Legal.

The policy is available on the Company's intranet and the Investor site at www.columbusglobal.com.

Reporting

All employees have a responsibility to prevent, detect and report all instances of bribery or corruption. Employees should therefore be alert to the possibility of bribery and corruption.

Any actual or suspected violation of this policy must be reported to Group Legal or via Columbus' whistleblower system. Columbus has established a whistleblower function for expedient and confidential notification of possible or suspected

wrongdoing. For more information, see Columbus' Whistleblower Policy, which is available at the Company's website: <https://www.columbusglobal.com/en/whistleblower-reporting>.

All reporting will be treated with confidentiality.

Failure to comply

Failure to comply with this Anti-Bribery and Anti-Corruption Policy, applicable laws and regulations may result in disciplinary action.

Any employee involved in violation of applicable laws may be personally subject to criminal sanctioning.

Exceptions

The Anti-Bribery and Anti-Corruption Policy must be strictly adhered to. However, if under special circumstances, an exception to the policy is considered appropriate, such an exception must always be approved by Group Legal.

Review

The Board of Directors will annually review and, if relevant, update the Policy.

Adopted by the Board of Directors on 11 December 2023.