



Anti-Corruption, Money- Laundering Prevention and Anti-Bribery Policy

Document Owner
Document Holder
Approval

Date of Approval

Chairperson of the board of directors
CFO
Board of directors of Bentley Endovascular Group AB
(publ)
2024-06-25

Anti-Corruption, Money-Laundering Prevention and Anti-Bribery Policy

Bentley Endovascular Group AB (publ)

1. ANTI-CORRUPTION POLICY

1.1 This policy provides an overview of Bentley's commitment against corruption and bribery. Bentley's code of conduct states that we apply and comply with the UN Global Compact's ten principles for sustainable value creation. This policy clarifies our ambition to fight corruption in all forms, in particular:

- Businesses shall work against corruption in all its forms, including extortion and bribery.
- Our ambition is to contribute to sustainable development through active and systematic work against corruption, extortion and bribery. The Group's reputation depends upon how we conduct our business. We want our employees, customers, business partners, suppliers, service providers and other stakeholders to be fully aware that we conduct our business in a responsible manner.

1.2 Bentley's ambition is to contribute to sustainable development through pro-active and systematic work against corruption, anti-bribery and conflicts of interest.

1.3 Of course, all applicable anti-Bribery and corruption laws, such as the U.S. Foreign Corrupt Practice Act (FCPA), UK Bribery Act and similar laws in every country in which the Group operates in, remain unaffected and Bentley is bound to such laws, as applicable. In case of discrepancies between this Policy and mandatory law, the stricter regulation shall apply.

2. ANTI-BRIBERY

2.1 Bentley has a zero tolerance of bribery of any sort in all its activities. This applies not only to the company and its management, shareholders and employees but also to any of its customers, business partners, suppliers, service providers and other stakeholders. Any payment, benefit or other advantage that is offered, promised, given, accepted, or requested, with the intention of encouraging an action that provides for an unfair advantage, is considered as bribery. Minor gifts, meals and other such gestures of appreciation and invitations to seminars or business events in the ordinary course of business are usually seen as a part of normal business management intended to build and maintain fruitful business relationships, unless otherwise provided by law, policies or codes of the Group. In the operational legal entities Bentley has adopted the detailed "Code of Conduct for Sales and Marketing - Cooperation with Healthcare Professionals.", which all the Group personnel and distributors are required to comply with.

2.2 In uncertain situations, please consult with the CEO, CFO or legal counsel. Any suspicions about bribery should be reported to the whistleblowing function, and we ensure that the whistleblower will be kept confidential and have no disadvantage from that act. We refer to the separate Whistleblower Policy.

3. GIFTS AND ENTERTAINMENT IN GENERAL, MONEY-LAUNDERING PREVENTION

3.1 GIFTS AND BUSINESS HOSPITALITY

3.1.1 It is customary within business culture that business partners give small gifts to those persons with whom they do business, for example at Christmas, at anniversaries and in connection with businesses. It is important, however, that such gifts do not affect receiver's business judgment or even give the appearance that judgment may be affected. Regulations in place at the recipient's place of work should be taken into account.

3.1.2 Generally, Bentley's employees and management must be very careful when providing and accepting gifts as pointed out in the section on anti-bribery. The Group employees may accept gifts from business associates, provided that the value of the gift is low and reasonable, and it does not create the appearance that person or company giving the gift is entitled to preferential treatment; it does not create the appearance that it would have an impact on the recipient's or our business decisions (such as choice of supplier or service provider). Gifts should always be disclosed and made transparent to the superiors, so that no indication of receiving an unfair benefit happens.

3.1.3 Meals may be offered to business partners in a common, non-luxury setup from time to time, as long as the cost limits determined by the Group (if any) are not exceeded. Invitations of business partners to a certain place may only be permissible if there is a requirement for the hospitality, it is for business purposes and no accompanying persons are invited, too. Also here, luxury hotels can never be paid for by Bentley.

3.1.4 Bentley's employees shall never ask for gifts or other items that benefit them personally, regardless of value. Employees are expected to exercise good judgment in accepting gifts from suppliers, customers or other business associates. Cash or cash-like gifts are never acceptable. Employees should consult the Groups' management when in doubt as to whether a gift is appropriate.

3.1.5 Bentley reserves the right to change the rules on gifts and hospitality at any time.

3.2 ENTERTAINMENT

3.2.1 Business entertainment (such as meals, tickets to the theatre or a sporting event etc.) can play an important role in strengthening and building working relationships among business associates. Accordingly, Bentley's employees may accept business entertainment offered or entertain business associates for legitimate business purposes, such as building goodwill and enhancing relationships with customers or suppliers. Bentley's employees may not participate in such events where (i) applicable law or any Policy approved by the Group prohibits participation, (ii) the purpose is to provide someone undue preferential treatment (or if participating at the event can create the appearance that the relevant business associate is given undue preferential treatment); (iii) it has or can create the appearance that it would have an impact on any business decisions by the Group or its employee or the relevant business associate; or (iv) it is not reasonable and/or appropriate in the context of the occasion.

- 3.2.2 General events targeting people from several organisations at once can act as useful and good networking occasions and are as such generally more acceptable than events targeting one or several individuals from one organisation only. This general rule applies both for the Groups' employees as guests or for situations when we organize an event. All the Group employees are responsible for exercising careful consideration and good judgment in entertaining or accepting entertainment.
- 3.2.3 As a general guideline for employees, business breakfasts or business lunches are acceptable provided that the restaurant and the meal offered are not excessive considering all participants' normal business behaviour.
- 3.2.4 When it comes to any events occurring outside business hours or involving travel, the Group employees should always inform the superior or Bentley's management. Invitations to any extraordinary trips where travel expenses are covered by the business associate hosting the event should be approved by the management of Bentley before the invitation is accepted. Bentley's management will consider whether such an event is in line with the policy of the firm taking into account all relevant aspects of such an event, such as the purpose of the event, other participants, assumed monetary value of the event and the business relationship between the host and the Group / the relevant the Group employee.

3.3 **COOPERATION WITH HEALTHCARE PROFESSIONALS AND HOSPITALS**

Concerning the cooperation with healthcare professionals, specific regulations apply and must be strictly observed. Regarding such cooperations, we have adopted the detailed "Code of Conduct for Sales and Marketing - Cooperation with Healthcare Professionals." In addition, applicable law must be observed and strictly complied with.

3.4 **MONEY LAUNDERING PREVENTION**

- 3.4.1 Bentley commits to fight against money laundry in any form and complies with the applicable legal regulations. Even though the business transactions are almost in any case done by wire transfer and the money laundering risk is considered as relatively low, we seek to establish routines to control and prevent any money laundry.
- 3.4.2 Bentley regularly runs risk analyses and provides respective instructions to all relevant employees, e.g. instructions on money laundering prevention and instructions on the handling of suspicious cases.
- 3.4.3 For each subsidiary, specific policies on money laundry are in place, including instructions for the relevant employees. Applicable anti-money laundering laws must be complied with, too.

* * * *