

## SONION ANTI-CORRUPTION POLICY

### 1 Scope and Background

At Sonion, we are dedicated to conducting our business consistent with our values and ethical standards as stated in the Sonion Code of Conduct. One of our core values is being 'Responsible', meaning that we are uncompromising in our ethics and, as a global company, act in full compliance with all applicable laws and regulations.

We have a zero-tolerance policy for any form of bribery or corruption, and we are committed to acting professionally and with integrity in all our business dealings and relationships. We expect the same behavior from any of our business partners, customers, suppliers, and any third parties working on our behalf.

This Anti-Corruption Policy (the "Policy") includes the basic rules on anti-corruption and sets the minimum standards. It is not possible for this Policy to describe every principle or practice related to corruption and bribery, but it addresses the main issues and is meant as a guide on the expected behavior.

This Policy applies to all individuals associated with Sonion, including but not limited to employees, directors, officers, agents, contractors, consultants, suppliers, and business partners worldwide. It extends to all business activities, operations, and relationships within and outside the organization, including interactions with public officials and private entities. Our goal is to prevent and detect bribery and corruption, ensuring that our business operations are conducted ethically and transparently.

### 2 Definitions

**Bribery:**

Bribery refers to the act of offering, giving, receiving, or soliciting anything of value, directly or indirectly, to influence a person's actions or decisions, gain an unfair advantage, or obtain an improper business or personal benefit. Examples of bribery may include offering cash, gifts, favors, or kickbacks to influence business transactions or decisions.

**Conflicts of interest:**

Conflict of interest typically occurs when the personal activities of the employees, members of their families, or friends clash with the interests of the company and thus impair the employee's ability to make unbiased, arm's length decisions on behalf of the company.

**Corruption:**

Corruption refers to the abuse of entrusted power for personal gain, often involving the distortion of public or private institutions, processes, or activities. It encompasses actions such as bribery, embezzlement, fraud, extortion, nepotism, and money laundering.

**Facilitation Payment:**

A facilitation payment is a financial payment that may constitute a bribe and is made with the intention of expediting an administrative process. It is a payment made to a public or government official that acts

as an incentive for the official to complete some action or process expeditiously to the benefit of the party making the payment.

**Hospitality:**

Hospitality means any payment of meals, accommodation, transport, and travel associated or not with a business conference, meeting, or event or tickets to social events, including sports events, shows, concerts, or similar entertainment.

**Public Official:**

Public officials are individuals serving in an official capacity for a government body, agency, or public international organization. They include elected or appointed officials, employees, and representatives.

### 3 Principles and Prohibited Activities

**Bribery:**

Sonion strictly prohibits all forms of bribery. Sonion employees must not engage in any form of bribery, either directly or indirectly, in connection with our business activities. This includes offering, promising, giving, or accepting bribes or authorizing anyone else to do so. It is strictly prohibited to make improper payments, whether monetary or non-monetary, to influence any business decision, gain preferential treatment, or secure unfair advantages.

**Corruption:**

Sonion is committed to preventing corruption in all its forms. We strictly prohibit any actions that involve the abuse of power or authority for personal gain or the detriment of the organization or society as a whole. This includes engaging in embezzlement, fraud, extortion, money laundering, or any other corrupt practices.

**Facilitation Payments:**

Facilitation payments, even if considered legal in certain jurisdictions, are strictly prohibited at Sonion. Sonion employees must not make or accept facilitation payments.

**Gifts and Hospitality:**

Giving or receiving gifts, entertainment, or hospitality must adhere to Sonion's Gifts and Hospitality Policy. Sonion employees must exercise caution to ensure that such exchanges do not create an appearance of impropriety or influence in any business decision. Gifts and hospitality must be reasonable, proportionate, and aligned with customary practices in the relevant industry or culture.

Gifts and hospitality must never be promised or provided to Public Officials without prior approval from a member of the Management Team or the Head of Compliance, regardless of value.

**Charitable Contributions:**

All charitable contributions made on behalf of Sonion must comply with applicable laws, be transparent, and accurately documented. Contributions must not be made with the intent to influence or gain an improper advantage. Sonion does not permit political contributions of any kind. Our focus is on charitable endeavors that benefit communities and promote social welfare.

**Conflicts of Interest:**

Sonion employees must avoid conflicts of interest. When you do business with family members or friends on behalf of Sonion, there may be a conflict of interest, as you may have another interest in such a business situation than Sonion. If there is any risk of such a conflict of interest arising, you are always obliged to inform your manager about this to ensure transparency and obtain approval.

## 4 Responsibilities

**Board and Management:**

The Board of Directors has the overall responsibility for ensuring that this Policy complies with Sonion's legal and ethical responsibilities and obligations. The senior management team and managers at all levels must lead by example, setting the tone from the top and establishing a culture of integrity and compliance throughout the organization. All managers are responsible for implementing this Policy and must actively support and enforce anti-corruption measures.

**Employees:**

All Sonion employees must familiarize themselves with this Policy and strictly adhere to its principles and follow the guidelines, including completing all mandatory compliance training. Sonion employees must raise concerns and actively report any suspected or actual breaches of this Policy through the relevant channels.

**Third Parties:** Sonion expects all agents, contractors, suppliers, consultants, and business partners to uphold the same anti-corruption standards as outlined in this Policy. Sonion will, where appropriate, conduct due diligence on third parties before entering into any business relationship.

## 5 Breach of this Policy

Breach of this Policy will result in appropriate disciplinary action, which may include termination of employment or business relationships. In addition to internal consequences, individuals may be subject to civil or criminal penalties as prescribed by applicable laws.

## 6 Reporting of Breaches

Any suspected or actual breaches of this Policy must be reported immediately through your Local Managing Director or the Head of Compliance/General Counsel.

If you are not comfortable with this, or in case you have already taken action as described above, and you believe that the issue has not been handled correctly, you may report the issue to the Sonion Whistleblower Line in accordance with the Sonion Whistleblower Policy. You can access the Sonion Whistleblower Line here: <https://report.whistleb.com/en/sonion>

Any reported incidents will be promptly investigated, and appropriate actions will be taken, including implementing corrective measures and disciplinary actions. In Sonion, we will not tolerate harassment, vengeful actions, or other types of sanctions against any person who, in good faith, files a report or who

assists Sonion in connection with the processing and investigation of a case. There will be no acts of retaliation taken against any employee who reports, in good faith, a violation or who assists Sonion with the investigation of a case.

## 7 Information

If you have any questions with respect to this Policy, contact the Head of Compliance/General Counsel.

If you are contacted by the authorities, please immediately contact the Local Managing Director or the Head of Compliance/General Counsel.

## 8 Policy Review

This Anti-Corruption Policy will undergo regular reviews to ensure its relevance and effectiveness in preventing bribery and corruption. Updates will be made as necessary to align with changes in laws, regulations, or industry best practices. The most recent version of this Policy will always apply.