GASUM ANTI-BRIBERY AND CORRUPTION POLICY SEPTEMBER 2026

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1. Introduction, objectives, scope and general principles of the policy

The Gasum Anti-Bribery and Corruption Policy is an integral part of Gasum's responsible business practice framework headed by the Gasum Code of Conduct. While the Code of Conduct sets out higher-level requirements for ethical behavior, the Anti-Bribery and Corruption Policy provides more detailed guidance on preventing and addressing bribery and corruption, clarifying the principles, approach and expectations in these specific areas. This Policy applies to all Gasum Group companies, Units, and Gasum personnel.

Gasum enforces a zero-tolerance policy towards all forms of bribery and corruption. Gasum personnel and business partners must not offer, give, request, or accept any undue advantage that could influence business decisions or compromise Gasum's values. This applies across all operations and jurisdictions.

Bribery and corruption are criminal offenses under the laws of Gasum Group's operating countries and international conventions, including the OECD Anti-Bribery Convention. Violations may result in fines, imprisonment, and serious reputational harm. Gasum complies with all applicable regulations and expects the same from its personnel and partners. Breaches of this Policy will lead to disciplinary actions.

Relevant definitions

Bribery: The act of offering, giving, receiving or requesting something of value to improperly influence the actions or decisions of another party.

Corruption: Abuse of influence for personal and unjustified gain. Abuse can be illegal or otherwise unethical behavior.

2. Gasum's operational environment

Gasum is committed to upholding high standards towards ethical conduct, transparency, and integrity in all its operations. This commitment reflects Gasum's responsibility toward customers, partners, and society. Gasum recognizes that these standards must be consistently demonstrated in everyday decision-making, interactions, and business practices.

Gasum operates primarily in the Nordic countries, where the overall country risk related to corruption is considered low according to the Corruption Perception Index (CPI). Although geographical risks may be considered limited, exposure to bribery and corruption risks may be considered elevated due to Gasum's involvement in the construction sector and building projects. Building projects include, for example, permit processes and complex subcontracting chains, which may introduce risks of bribery and corruption.

Gasum has identified and documented key bribery and corruption risks, which are reviewed annually or more often if considered necessary as part of risk management and compliance processes.

3. Roles and responsibilities

Gasum Board of Directors is responsible for overseeing anti-bribery and corruption management at Gasum. The CEO along with Gasum Management Team is responsible for ensuring that anti-bribery and corruption considerations are organized and managed as part of Gasum's operations. All Gasum employees are responsible for following the principles described in this Policy.

Day-to-day ownership for maintaining and updating this Policy, as well as assessing its relevance, lies with the Group Compliance function. Group Compliance acts in a supporting role by providing frameworks, tools, and guidance, and by consolidating the overall bribery and corruption risk view across Gasum. Each Gasum Unit is responsible for applying this Policy in practice as well as monitoring compliance and reporting any deviations. This Policy is formally approved by the Gasum Board of Directors, and reviewed annually by Group Compliance and the Gasum Board of Directors.

4. Principles

Gasum is committed to conducting business with integrity, transparency and in compliance with applicable laws and regulations. This section outlines Gasum's principles relating to situations where bribery and corruption risks may typically arise. Everyone at Gasum is expected to comply with these principles. In addition, all Gasum employees are required to follow the Gasum Code of Conduct, which sets out our principles for responsible business practices, and Gasum uses the Gasum Code of Conduct for Business Partners to impose our expectations and requirements on responsible business practices to our business partners. We also guide our agents and intermediaries to adhere to these standards.

To support the principles, Gasum has established processes and controls, including for example:

- Know Your Counterparty (KYC) process to identify and verify counterparties.
- Travel and expense invoice review and reporting process to ensure only expenses that are legitimate and according to company policies are approved.
- Gasum Group Corporate Governance Policy, which includes corporate governance approval rights to ensure decisions to use company funds are made at the right level of responsibility and authority.
- Gasum Group Procurement Principles, which outline the ways to achieve transparent, sustainable, high quality and cost-efficient ways to manage the value chain we operate in.
- Gasum Group Sponsorship Policy, which defines the principles around collaborations and sponsorship, support activities, donations and prize draws and goods donations.

Internal controls are embedded into Gasum's processes to prevent, detect, and address risks relating to bribery and corruption. Their effectiveness and functionality are regularly assessed as part of everyday business operations.

Relevant definitions

Internal controls: Processes and procedures implemented to ensure compliance with laws and policies, safeguard assets, and prevent fraud or misconduct. These controls help maintain integrity and accountability in financial and operational activities.

4.1 Gifts, entertainment and hospitality

Gasum recognizes that modest and transparent gifts, entertainment and hospitality may be part of maintaining professional relationships. They must never be intended to influence business decisions and should reflect customary business practices without creating a sense of obligation. Gasum recognizes that even customary gifts, entertainment and hospitality may be inappropriate in connection with ongoing business negotiations. It should always be considered whether they could be perceived as compromising impartiality. This applies to both giving and receiving gifts, entertainment and hospitality.

Acceptable gifts, hospitality and entertainment must be:

- Relevant – promotes the awareness and visibility of Gasum, supports our business objectives and has a visible and legitimate business purpose.
- Reasonable – the expense per participant is reasonable, and the nature of the hospitality is such that we avoid even the appearance of impropriety or excess.
- Transparent – all business hospitality is conducted in an open and respectful manner. No aspect of the exchange or activity is concealed or risks misinterpretation.

Gifts, hospitality and entertainment are not permitted if they:

- Are intended to improperly influence a decision or gain advantage.
- Are excessive, frequent, or given during sensitive business processes (e.g. tenders or audits).
- Include cash or cash equivalents (e.g. gift cards).
- Include partially or fully paid holiday trips.

If a gift, hospitality or entertainment is declined by the recipient, the decision must be respected without pressure or further offers.

If the arranging personnel are not present during the entertainment or hospitality, the event is considered a gift.

Relevant definitions

Gift: Tangible or intangible item or benefit that has direct or indirect value for the recipient.

Entertainment and hospitality: The provision of meals, entertainment, or travel intended to foster business relationships.

4.2 Sponsorship

The aim of Gasum's sponsorship and support activities is to reinforce Gasum's strategic objectives, maintain Gasum's corporate image, as well as carry out marketing and responsible business activities. Sponsorships and support activities must align with Gasum's Code of Conduct and values: respect, sustainability and positive energy. All sponsorships and donations are managed by Gasum Group Communications.

Gasum does not donate to organizations with Gasum management or personnel in their governing bodies.

Relevant definitions

Sponsorships: Financial or other support provided to an event, activity, individual or organization in exchange for brand visibility or association.

4.3 Charity, donations and political support

Donations must always be made without any expectation of compensation. Donations can be made to charitable purposes when the recipient is recognized as serving a legitimate public interest. The donation must align with Gasum's Code of Conduct and values: respect, sustainability and positive energy. All donations are recorded in accounting records and included in audited financial statements.

The charitable donations are selected by Gasum Group Communications and approved by the Gasum Management Team.

Gasum does not make contributions to political parties, individual politicians or political activities.

Relevant definitions

Charitable donations: Voluntary contribution of money, goods or services to a nonprofit or charitable cause without expectation of reciprocal benefit.

Political donations: Any donation of money, goods, or services to support a political party, candidate, or campaign.

4.4 Lobbying

Gasum is committed to conducting all lobbying activities in a transparent and responsible manner. To ensure openness and accountability in Gasum's interactions with public authorities and decision-makers, relevant lobbying actions will be recorded and reported in accordance with applicable register requirements.

Relevant definitions

Lobbying: The practice of engaging with public officials or decision-makers to provide information or perspectives on issues that may affect legislation, regulation, or policy.

5. Process for identifying and addressing suspected and committed violations

All employees, contractors, and third parties are encouraged to report any suspected or actual violations of this Policy promptly and in good faith. Reports can be made confidentially through the whistleblowing channel or directly to Group Compliance function. Gasum strictly prohibits retaliation against individuals who report concerns or participate in investigations.

When bribery or corruption is identified or suspected in the course of Gasum's business, an investigation is initiated and appropriate actions taken to prevent broader consequences. Such investigations are conducted by persons who are not connected to the case and are not under the same line management with the persons whose actions are investigated. Findings from the investigation are reported to the line management of the individual(s) concerned. When necessary, the results are also reported to Gasum Management Team, Gasum Board of Directors and relevant supervisory bodies.

Failure to comply with this Policy will lead to disciplinary actions up to and including termination of employment or contractual relationship. When applicable anti-bribery and corruption laws are violated, Gasum follows legal and regulatory procedures, including cooperating with law enforcement authorities and regulatory bodies, to ensure that the matter is addressed in accordance with the applicable legal framework.

6. Terminology

Bribery: The act of offering, giving, receiving or requesting something of value to improperly influence the actions or decisions of another party.

Charitable donations: Voluntary contribution of money, goods, or services to a nonprofit or charitable cause without expectation of reciprocal benefit.

Conflict of interest: Situation where a person or organization has multiple interests and one of them may jeopardize or adversely affect the impartial management of another interest. Gasum Code of Conduct requires that we do not enter into business relationships that may, either directly or indirectly, result in a conflict of interest.

Corruption: Abuse of influence for personal and unjustified gain. Abuse can be illegal or otherwise unethical behavior.

Gift: Tangible or intangible item or benefit that has direct or indirect value for the recipient. Entertainment and hospitality are considered gifts if the arranging personnel are not present during them.

Entertainment and hospitality: The provision of meals, entertainment, or travel intended to foster business relationships.

Internal controls: Processes and procedures implemented to ensure compliance with laws and policies, safeguard assets, and prevent fraud or misconduct. These controls help maintain integrity and accountability in financial and operational activities.

Lobbying: The practice of engaging with public officials or decision-makers to provide information or perspectives on issues that may affect legislation, regulation, or policy.

Political donations: Any donation of money, goods, or services to support a political party, candidate, or campaign.

Sponsorships: Financial or other support provided to an event, activity, individual or organization in exchange for brand visibility or association.

Gasum

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