
PROBI

ANTI-CORRUPTION POLICY*

**This is a summary version of Probi's internal policy.*

The original policy document consists of 7 pages and has following table of contents. This document only presents the main objectives of the policy.

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INTRODUCTION

PROBI Aktiebolag (publ) (“**Probi**”) performs its business operations in a responsible and ethical manner. This is achieved through the adherence to all applicable laws and regulations, strong company values, as well as maintaining good relationships with colleagues, customers and suppliers.

Probi has adopted this policy (the “**Policy**”) for the prevention, deterrence and detection of corruption. The term corruption is generally associated with the giving and taking of bribes. Anti-bribery laws criminalize bribery and undue influence from being directed against someone who has been entrusted to act on behalf of others – may it be on behalf of individuals, corporate entities, organizations, judicial or governing bodies, agencies or municipalities, or the society at large.

Non-compliance with anti-corruption laws can have a serious economical and reputational impact on the business and financial condition of the Probi group and may also result in violations of undertakings that Probi has made in its financing arrangements.

The Policy applies to all employees at Probi, including managers, executive officers, contract employees and members of the board of directors. The Policy also applies to those who represent Probi or Probi’s products or act on its behalf, such as consultants and authorised distributors and agents.

OBJECTIVE

The Policy is intended to provide clear and practical guidance as to applicable anti-bribery rules and policies, the internal functions responsible for the management and supervision of the Policy and the consequences of non-compliance with the Policy.

FUNDAMENTAL REQUIREMENTS

The business operations of Probi are to be performed in accordance with all applicable laws and regulations. Probi does not seek or accept business advantages based on illegal, improper, or unethical behaviour. Probi must not use illegal payments, bribes, kickbacks or other questionable inducements to influence someone’s professional duties or to obtain or retain an undue business advantage. The same applies to receiving benefits.

Extra care must be taken when interacting with representatives of the public sector and in relation to public procurement and governmental decision-making.

Employees who are uncertain of the laws, regulations or policies applicable to him or her, are required to seek guidance from the chief financial officer of the Probi group (the “**CFO**”).

No employee will suffer retaliation or other adverse consequences for refusing to pay bribes, engage in corrupt practices or for complying with this Policy, even if it may result in Probi losing business.

WHAT IS CORRUPTION

The essential elements of anti-corruption laws consists of an improper payment, offer, or promise of anything of value to any person in a position to influence a decision. Normally, it covers also the granting of benefits to a third party (such as an agent, distributor or consultant), who in turn, exerts improper influence over the actions of a person exercising authority.

An improper benefit, i.e. a bribe, may take different forms, and the parties involved may classify the improper benefit as a purchase price or a consultancy fee in order to hide the true nature of the transaction. The typical bribe is money or other property of economic value, but advantages of a non-monetary nature, such as recommendations and distinctions or awards, are also included in the scope.

For example a bribe can be; gifts, entertainment, invitations to events or seminars, travel and accommodation, use of property or equipment, job offers and work placements, charitable donations, political donations, services, favors and not least benefits for family and friends.

NON-COMPLIANCE

An employee or representative who does not comply with applicable anti-corruption laws exposes him/herself as well as Probi to criminal and/or civil liability and significant reputational harm. Penalties for violations of anti-corruption laws can include fines and imprisonment.

Employees who violate anti-corruption laws or this Policy, or refuses to cooperate with a related investigation, will be subject to appropriate actions by Probi, which may include disciplinary actions, such as reprimands, termination of employment and immediate dismissal.

No employee will suffer retaliation or other adverse consequences for refusing to pay bribes, engage in corrupt practices or for complying with this Policy, even if it may result in Probi losing business.

TRAINING

Probi shall provide adequate training for all employees consistent with Probi's risk profile and appropriate to employee responsibility.