SAMSØE SAMSØE

ANTI-CORRUPTION POLICY

AUGUST 2026

1. PURPOSE

Samsøe Samsøe is committed to conducting all business activities with honesty, integrity, and transparency. Corruption in any form — whether bribery, kickbacks, extortion, facilitation payments, or the misuse of influence for personal gain — undermines the trust on which our business relationships are built and is incompatible with our wider commitment to responsible business conduct. This policy sets out our approach to preventing and addressing corruption across our own operations and value chain. It establishes clear expectations for all employees and business partners, and provides practical guidance for identifying and responding to corruption-related risks.

This policy forms part of Samsøe Samsøe's broader responsible business conduct framework and should be read alongside our Code of Conduct, Responsible Business Conduct Policy, and Whistleblower Policy.

2. SCOPE

This policy applies to all of Samsøe Samsøe's own operations globally, across all offices, stores, and functions, and to all parties operating within or on behalf of our value chain. This includes the board of directors, executive management, managers, all employees regardless of seniority or contract type, and external parties including suppliers, buying agents, licensees, logistics providers, subcontractors, and other intermediaries acting on our behalf. All parties are expected to comply with this policy as a condition of their relationship with Samsøe Samsøe.

This policy applies regardless of the country or market in which a transaction or business relationship takes place. Where local laws or customs appear to conflict with the standards set out here, this policy applies unless local law imposes a stricter requirement, in which case local law prevails.

3. GUIDING PRINCIPLES AND STANDARDS

Our approach to anti-corruption is grounded in internationally recognised frameworks. We are aligned with and act in accordance with the following:

- UN Convention Against Corruption (UNCAC)
- UN Global Compact, Principle 10 – requiring businesses to work against corruption in all its forms, including extortion and bribery
- OECD Guidelines for Multinational Enterprises, Chapter VII – Combating Bribery, Bribe Solicitation, and Extortion
- UK Bribery Act 2010, which informs our approach to facilitation payments and serves as a reference standard for our operations and business relationships in relevant markets

4. POLICY STATEMENT

4.1. DEFINITIONS

For the purposes of this policy, corruption is understood as the abuse of power or position for personal or organisational gain, whether material or otherwise. It encompasses a range of conduct, including but not limited to the following:

Bribery is the offering, promising, giving, requesting, or accepting of any financial or other advantage – including money, gifts, hospitality, or services – in exchange for improper conduct or a favourable business outcome.

Kickbacks are a form of bribery specific to commercial transactions, where a supplier or business partner offers a reward to an individual within the purchasing organisation in exchange for placing or retaining business with them. This is a recognised risk in sourcing and procurement relationships.

Extortion is the use of threats, force, or undue pressure to obtain money, advantages, or conduct from another party.

Embezzlement is the misappropriation or theft of funds, assets, or resources to which a person has legitimate access, for private use.

Favouritism is the unfair preferencing of a person, organisation, or group in business decisions, including purchasing or contracting, on grounds unrelated to merit or legitimate business criteria.

These definitions apply to direct and indirect conduct alike. An act of corruption does not need to be successful, nor does payment need to have been made, for this policy to have been breached.

4.2. PROHIBITED CONDUCT

amsøe Samsøe maintains zero tolerance for corruption in any form across its own operations and value chain. No employee, representative, or business partner acting on behalf of Samsøe Samsøe may, directly or indirectly:

- Offer, promise, give, or authorise any payment, gift, or advantage to any person or organisation with the intent to improperly influence a business decision or outcome
- Request, accept, or agree to receive any payment, gift, or advantage from a third party where there is reason to believe it is intended to obtain a business advantage from Samsøe Samsøe or its partners
- Engage in any conduct that constitutes extortion, kickbacks, embezzlement, or favouritism as defined in Section 4.1
- Threaten or retaliate against any employee or business partner who has refused to participate in corrupt conduct or who has raised a concern under this policy
- Engage in, facilitate, or fail to report any activity that could reasonably be expected to lead to a breach or perceived breach of this policy

These prohibitions apply regardless of the value of the advantage involved, the country or market in which the conduct takes place, and whether or not local custom might regard the conduct as acceptable.

4.3. FACILITATIONS PAYMENTS

Facilitation payments are unofficial payments made to secure or expedite a routine action to which the payer is legally entitled – for example, payments to a government official to obtain a permit, release goods from customs, or process documentation. Samsøe Samsøe prohibits facilitation payments in all circumstances when acting on behalf of the company.

We recognise that employees or partners operating in certain markets may encounter demands for facilitation payments. If this occurs, the individual must report the demand to their direct manager or to the CSR team as soon as practicable, and any response must be aligned with their instruction. All demands for facilitation payments must be recorded for internal record-keeping purposes, regardless of whether any payment was made.

4.4. GIFTS AND HOSPITALITY

Samsøe Samsøe recognises that the exchange of gifts and hospitality is a normal part of business relationships in many contexts and does not prohibit reasonable and proportionate hospitality, provided it is transparent, offered in the name of the company rather than an individual, and cannot reasonably be interpreted as an attempt to influence a business decision. All gifts and hospitality received from external parties must be registered by the receiving employee through our internal gifts and hospitality register, regardless of their nature or value. Prior manager approval is additionally required before accepting any gift where it originates from an active or prospective supplier or business partner, is received during or close to a tender or procurement process, or where there is any reason to believe the offer relates to a pending business decision.

The following situations represent a breach of this policy regardless of value: gifts or hospitality intended to influence a business outcome; cash or cash-equivalent gifts including vouchers; gifts given or received secretly; gifts given in an individual's personal name rather than that of the company; and any gift or hospitality offered to or received from a public official, government representative, or politically exposed person. Employees who encounter situations involving such parties should contact the Head of Sustainability before taking any action. Where gifting norms vary across cultures and markets, the intent behind the exchange should always be the primary consideration.

4.5. CONFLICTS OF INTEREST

A conflict of interest arises when a personal interest (financial, relational, or otherwise) could improperly influence, or be perceived to influence, a business decision made on behalf of Samsøe Samsøe. Conflicts of interest are a recognised precursor to corruption and must be proactively disclosed and managed.

Employees are required to disclose any actual or potential conflict of interest to their line manager as soon as they become aware of it. This includes, but is not limited to, holding a financial interest in a supplier or business partner, having a close personal relationship with someone whose organisation is seeking to enter or retain a commercial relationship with Samsøe Samsøe, or receiving personal benefits from a business partner outside of normal and declared hospitality. Employees who have disclosed a conflict of interest must not participate in any related decision-making process until the matter has been reviewed and a course of action agreed with their manager. Neither employees nor their immediate family members may give, accept, or guarantee loans from any person or organisation with whom Samsøe Samsøe conducts business.

4.6. POLITICAL CONTRIBUTIONS AND CHARITABLE DONATIONS

Samsøe Samsøe does not make political contributions of any kind – whether financial, in-kind, or through the provision of services – to political parties, candidates, or campaigns in any market.

Charitable donations may be made where they serve a genuine philanthropic purpose and are approved through the appropriate internal process. No charitable donation shall be made with the intent or expectation of obtaining a business advantage, and donations must not be used as a mechanism for indirect bribery. All charitable donations are recorded and subject to review.

5. ROLES AND RESPONSIBILITIES

Preventing corruption is a shared responsibility of every person at Samsøe Samsøe. The following describes how oversight and accountability are structured:

Head of Sustainability (Policy Owner): Responsible for maintaining and reviewing this policy, coordinating anti-corruption procedures, overseeing the recording and follow-up of reported concerns, and ensuring that business partners are informed of and held to the standards set out here.

Leadership Team: Responsible for upholding the commitments in this policy within their respective functions, modelling ethical conduct, and escalating any identified risks or concerns to the Head of Sustainability.

All Employees: Expected to read, understand, and act in accordance with this policy at all times, to disclose actual or potential conflicts of interest promptly, and to report any suspected breach through the appropriate channel without delay.

Business Partners: Required to comply with this policy as a condition of their commercial relationship with Samsøe Samsøe, and to maintain their own procedures sufficient to prevent corrupt conduct within their organisations and on our behalf.

Employees and business partners may raise concerns confidentially through our whistleblower portal: samsoesamsoe.dahlwhistleblower.com

6. IMPLEMENTATION AND MONITORING

Samsøe Samsøe implements its anti-corruption commitments through internal governance, partner engagement, and record-keeping.

Internally, all employees are required to read and confirm their understanding of this policy. Samsøe Samsøe will review its anti-corruption programme annually, including training materials and related guidance, to ensure continued effectiveness. Training content will be developed in collaboration with the HR team and will cover the definitions, prohibited conduct, and reporting procedures set out in this policy. Completion will be tracked and recorded.

All demands for facilitation payments, disclosed conflicts of interest, and gifts or hospitality that required manager review must be recorded and retained by the relevant line manager and reported to the Head of Sustainability. Records are maintained for a minimum of five years.

For business partners, anti-corruption expectations are communicated through our Code of Conduct and this policy, both of which form part of our standard onboarding requirements. Partners in higher-risk sourcing markets or roles are subject to additional due diligence as part of our broader responsible business conduct approach.

This policy and its implementation are reviewed annually by the Head of Sustainability, with findings reported to the Leadership Team.

7. COMPLIANCE AND CONSEQUENCES

All employees are required to act in accordance with this policy. Where a breach is identified, it will be investigated promptly and addressed through Samsøe Samsøe's disciplinary procedures. Depending on the nature and severity of the violation, consequences may include formal warnings, removal from relevant responsibilities, or dismissal. Where conduct may constitute a criminal offence, the matter may be referred to the relevant authorities.

All business partners are required to comply with this policy as a condition of their commercial relationship with Samsøe Samsøe. Where non-compliance is identified, we will engage with the partner to understand the circumstances and agree remedial action. Partners who are found to be in serious or persistent violation of this policy, or whose conduct exposes Samsøe Samsøe to legal or reputational risk, may face suspension or termination of the commercial relationship.

No employee or business partner will face retaliation for raising a concern in good faith under this policy. Any attempt to intimidate or retaliate against a person who has reported a suspected breach will itself be treated as a serious violation.

8. REPORTING

Ultimate accountability for anti-corruption at Samsøe Samsøe sits with our CEO. Operational oversight is managed by the Head of Sustainability, who is responsible for tracking the implementation of this policy and escalating significant concerns to the Leadership Team and CEO as appropriate.

Samsøe Samsøe reports on its anti-corruption commitments and progress as part of its annual Sustainability Report. This includes disclosure of any significant concerns raised, actions taken, and improvements made to our procedures. Where gaps or failures are identified, these will be disclosed alongside the steps being taken to address them.

Concerns relating to suspected breaches of this policy may be reported at any time through our whistleblower portal at samsoesamsoe.dahlwhistleblower.com, which allows for anonymous reporting. Concerns may also be raised directly with the Head of Sustainability or with any member of the Leadership Team.