

1100 Corporate social responsibility policy

14.12.2023

Approved by the Axactor Board

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1. Purpose

Axactor has an ambition to be a socially responsible company acting ethically and lawfully in all aspects of its value chain. All employees shall have thorough knowledge of Axactor's policies and know how to proceed if they detect behaviour that violates Axactor's policies.

Axactor is determined to run its operations with a best practice attitude towards human rights, employment and the way we treat our fellow workers and those we meet through our work. Axactor shall act with professionalism, expertise and high ethical standards at all levels.

Axactor shall have a strong global commitment, anchored in our core values and the way we run our business. Axactor shall comply with applicable laws and regulations, and always in an ethical, sustainable, and socially responsible manner. This combined with our vision statement and corporate principles lay the foundation for all work within corporate responsibility.

2. Target group

This policy, related procedures and supporting documents applies to all Directors of the Board, employees, including temporary employees, legal entities within the Axactor Group and where applicable to consultants and subcontractors, pursuant to the Axactor Corporate Governance policy.

3. Governing principles

The Group's corporate principles shall be reflected in our policies, procedures and shall describe how we make decisions, act, and prioritize both while planning and when conducting day to day operations. Simply complying with Group policies and procedures are not sufficient and it is essential that each employee, management, and partners at all times act with the highest standards of ethical behaviour enshrined with Axactor's values and business principles, as also outlined in Axactor's code of conduct.

Axactor shall:

- always balance potential benefits of actions, against the consequences to society.
- incorporate profitable business with social, ethical and environmental goals and actions.

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- communicate clearly its demands and expectations regarding corporate responsibility and ethical conduct to employees and business partners.
- have corporate responsibility as a defining factor when developing financial products and services, and a defining factor in our asset management operations.
- work to reduce its environmental footprint, and when purchasing products or services, high environmental quality shall be emphasized.
- work to prevent any potential criminal activities from occurring within the organisation.
- have a transparent management structure in line with national and international standards for good corporate governance building.
- have a strong compliance and internal control culture with an open reporting environment to receive and handle, in full confidentiality, at the earliest stage possible, all reports made about any occurrence, whether established or soundly suspected, of a breach of applicable laws and regulations, the company's code of conduct, or other ethical concerns reported
- only cooperate with clients, business partners and suppliers who operate in compliance with laws and regulations, good business practices and who maintains high ethical standards, as described in Axactor's supplier code of conduct.

Zero tolerance of corruption

Axactor has zero tolerance of corruption in all its forms as outlined in our code of conduct and anti-fraud and anti-corruption policy. The zero tolerance of corruption is including facilitation payments, extortion, bribery and trading in influence.

Loyalty and conflicts of interest

All employees are expected to be loyal to Axactor and its interests and shall refrain from participating in financial and/or business-related activities or decisions that could potentially create a conflict of interest between Axactor's interests and their own personal interests or those of a close third party.

Respect of human rights

Axactor is fully committed to support and respect the protection of internationally proclaimed human rights. Axactor will not in any way be complicit in any sort of human rights abuses.

All units in Axactor shall comply with UN's Universal Declaration on Human Rights, The UN's Convention on Rights of the Child, International Labour Organisation Conventions (ILO

conventions), the UN Guiding Principles on Business and Human Rights as well as other applicable conventions and international standards on Human Rights.

Take care of the environment

Axactor is conscious and interested in environmental issues. Axactor support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies.

Labor and working environment

Axactor uphold a working environment that is characterized by openness, communication, and respect for the individual. Axactor recognizes the freedom of association and the right to collective bargaining.

No discrimination, harassment or bullying is tolerated. Diversity, and a balanced work force in terms of gender, is recognized as strength and an advantage. Axactor offer a working environment where it is possible to combine work, career, family life and spare time. Axactor values the competences their employees are in possession of. Sharing of knowledge and information is therefore an area of priority, as is on-the-job development.

Axactor provide a safe, healthy (physically and psychologically) and satisfactory workplace and do not engage in or support any kind of forced-, compulsory- or child labour.

Fair trading and antitrust legislation

Axactor will compete in a respectable and ethically responsible manner within the framework of anti-trust legislation and relevant competition regulation in the markets in which Axactor operates.

Contribute to a sound economy

Axactor assist improving cash flow, increase liquidity and minimize risk of our clients and help debtors get out of debt through fair debt collection practises and by providing support and advise.

4. Supporting procedures and documents

There are no specific procedures which support this policy, but the overall corporate governance regime.

Review log

Version	Date	Changed by	Comments
1.0	12.12.18	HR director	
2.0	12.12.19	HR director	
3.0	15.12.20	Chief of Staff	
4.0	15.12.21	Chief of Staff	Simplified
5.0	15.12.22	Chief of Staff	Reference to human rights
6.0	15.12.22	Chief of Staff	Minor adjustments to language
7.0	14.12.23	Chief of Staff	No changes