

Owner:	General Counsel
Date:	2022-10-03
Revision:	A
Reference ID:	LCPO-0012

Group Function Legal & Integrity

Anti-Corruption Policy

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1. Objective

As world leader in turbocharging technologies, Accelleron is committed to conducting business ethically and has zero tolerance for corruption and bribery, whether passive or active, public or private.

While the Accelleron Code of Conduct is the reference point to express our commitment in all integrity areas, this Policy focuses on the core anti-corruption principles and standards that we follow in all our activities and dealing with third parties.

As a company with global reach, interacting regularly with government owned companies, Accelleron complies with all the relevant anti-corruption laws and regulation including the Swiss Criminal Code, the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. Breaches of anti-corruption laws can result in severe consequences such as criminal prosecution as well as disciplinary measures and reputational damage for Accelleron, its employees, and officers.

2. Policy content

2.1 Scope

This Policy applies not only to Accelleron directors, officers and employees at every level and to all Accelleron entities (including its Joint Ventures), but also to all individuals or entities that represent Accelleron toward third parties.

This Policy covers the following topics:

- Anti-Corruption
- Gifts, Travel and Hospitality
- Facilitation Payments
- Political Contributions
- Sponsorship and Donations
- Conflicts of Interest
- Third Party Management

2.2 Definitions

Conflict of Interest:

Any situation when personal or professional interests, activities or relationships affect Accelleron's employee ability to be impartial and to do what is in the best interest of Accelleron. Such interests, activities or relationships can arise through: (i) relationships with vendors, suppliers, contractors, competitors (ii) financial interests in businesses outside Accelleron; (iii) work outside Accelleron; (iv) directorships, board memberships, advisory roles and similar corporate positions outside Accelleron; (v) political positions or appointments, including when Accelleron employees are taking Public Official positions or when an employee has a close personal relationship (including family members) with someone who is a Public Official; (vi) relationships with other Accelleron employees; and (vii) any other relationship or position that may reasonably be perceived to affect judgment.

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Donations

A contribution made to a charitable organization or community entity for social, educational, environmental, cultural benefit, which is in line with Accelleron's sustainability and community engagement strategies. Donations include cash funding and in-kind contributions, such as goods or services.

Facilitation Payment

Payments of a small amount made to expedite or secure the performance of a routine governmental process, such as obtaining official documents or site access, processing governmental papers or providing police or utility services. Examples include visa applications, customs or immigration checks or any administrative procedure.

Gifts

Goods or services of limited, reasonable value given in relation to the promotion of the company's products or services or as a sign of regard or appreciation. They must be in conformity with local laws and the customer's code of conduct and must be explicitly given without the intent or expectation of any consideration or value in return. Gifts may be used for promotion of the company's brand by incorporating a logo or message on a reasonable promotional item. Cash or loans must not be given as a gift.

Hospitality

Entertainment, meals, receptions, tickets to entertainment, social or sports events, participation in sports events, given or received to initiate or develop a professional relationship.

Public Officials

- any officer or employee of any government (e.g. any government department or agency) or any company owned or controlled by a government (e.g., state-owned entities) or any company performing acts of government;
- any political party, political party official or candidate for public office at any level;
- any officer or employee of a public international organization;
- any member of a royal family or member of the military or police;
- any individual acting in an official capacity for or on behalf of any of the above categories (whether paid or unpaid); and
- any individual otherwise categorized as a Public Official under applicable local laws.

Sponsorship

A form of marketing, used to build and increase the positive perception of the Accelleron brand. A sponsorship provides a direct connection with specific target audiences to increase their awareness and/or understanding of the brand. It involves payment of money, or other things of value, to support an event, activity or organization with which Accelleron will be associated, and receive brand exposure, experience or any other promotional or tangible benefits in return.

Travel

Transportation, accommodations and other travel related costs (e.g., air or train tickets, hotel accommodation) incurred by a prospective client, a customer, a supplier, a service provider or another stakeholder or their employees. Travel may be incurred in connection with an individually agreed event or as part of a contractual agreement. The payment or reimbursement of customers' or other third parties' travel is permitted only on a case-by-case basis, following the rules described in the Global Travel & Expense Policy, always subject to further limitations under applicable local

4/7 laws. The same applies for having travel paid or reimbursed by a supplier or other third party for an Accelleron employee.

2.3 Anti-Corruption Laws in a nutshell

Many countries in which Accelleron operates have adopted strict anti-corruption laws. These laws make it illegal for anyone to directly or indirectly offer, promise, solicit or receive anything in value for the purpose of obtaining, retaining or securing an improper business advantage.

Corruption refers not only to providing cash, but also to many other benefits that are provided with the purpose of improperly influencing a business decision.

Corruption can take many forms (for example bribery, kickbacks, facilitation payments, influence in trading), and all involve the abuse of public or private office for personal gain.

It is important to note that these laws put a special emphasis on interactions with Public Officials and their close circle. These laws also make it illegal for individuals to purposely ignore or turn a blind eye on potential corruption committed by others, including by third parties acting on behalf of the company.

Employees must understand and recognize that violations of anti-corruption laws raise serious legal and ethical concerns, undermine good governance and can have severe civil and criminal consequences for the individuals involved, as well as for Accelleron and its employees.

It is the duty of each employee to know the anti-corruption laws that apply to their activities and to abide by them.

2.4 Gifts, Travel and Hospitality (GTH)

This paragraph provides the basic guidelines regarding GTH at Accelleron and it should be read in conjunction with rules and principles specified in the Global Travel and Expense Policy (see 2.5) and its Appendix 2 Instruction for Gifts, Travel and Hospitality. All employees must refer to such instructions before promising, offering or receiving any Gift, Hospitality or Travel to or from third parties.

In general, it is acceptable to promise, offer or receive Gifts, Travel or Hospitality from/to third parties if they are not perceived as a means to improperly influence the recipient's judgment and they are in compliance with:

- a) The Global Travel Expense Policy and the Appendix 2 Instructions for GTH, particularly the relevant guidelines and relevant pre-approval process via the Accelleron Integrity App;
- b) All applicable policies, laws and rules especially those regarding interactions with Public Officials;
- c) Internal policies and standards of the recipient's organization.
- d) The Local Thresholds Table available on the L&I Intranet for specific local limits regarding GTH to public officials.

2.5 Facilitation Payments

Accelleron prohibits the offering of any illegal or improper payments, including Facilitation Payments. If you are approached with a request for a facilitation payment you should:

- reject the request and justify the refusal;
- refer to the local law and exposure to possible criminal prosecution;

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- question the legitimacy and need for payment and ask whether you will receive a receipt;
- report the incident to the Legal & Integrity (L&I) team;
- exceptions are only allowed in serious medical or safety emergencies and, after the incident, it must be documented and reported to the L&I team.

2.6 Political Contributions

No employee shall directly or indirectly make any contribution on behalf of Accelleron to any political party, organization or event, or to any candidate for political office without prior approval from the L&I team.

Political contributions may be prohibited in many locations.

2.7 Sponsorships and Donations

Sponsorships and Donations carry the risk of potentially being used as bribes. Accelleron employees should not promise, offer or receive any Sponsorships or Donations if they are meant to improperly influence the recipient's judgment.

Accelleron promotes Sponsorship and Donation in very limited circumstances and the Global Travel & Expense Policy (Section 2.6) sets out the minimum standards for these kinds of activities. In general, all Sponsorships and Donations must have a clear business-oriented purpose and be consistent with Accelleron's sustainability and community engagement strategy and provide social, education, environmental or cultural benefit. Sponsorships and Donations activities must be always approved by the L&I Team.

2.8 Conflicts of Interest

Under no circumstance should an employee find him/herself in a situation where his/her personal or professional interests are prioritized over the best interest of Accelleron, or may be perceived as such by someone else. Accelleron's interests shall always prime over individual interests in any dealings made on behalf of Accelleron. No employee shall take advantage of his/her position at Accelleron to seek an undue preferable treatment or advantage.

Transparency is key in addressing actual or perceived conflict of interest. It is essential to promptly disclose this through the Accelleron Integrity App so that the company becomes aware of the situation and may take appropriate mitigating steps. For further details regarding the process of declaring an actual or perceived conflict of Interest, please refer to the Instruction on Conflicts of Interest.

2.9 Third Party Management

In accordance with this Policy, Accelleron has implemented a risk-based process to run due diligence checks on third parties before engaging with them. The level of due diligence is determined by various factors such as type of relationship between Accelleron and the third party, location involved, information provided by the third party and various risk assessment activities (operational, anti-bribery and corruption and other Integrity issues).

We have adopted specific instructions to manage integrity risk arising from our third-party relationships. These include the Third-Party Management Procedure which communicate the generally applicable global integrity requirements to onboarding/engaging, monitoring and

6/7 terminating relationships between Accelleron and different categories of third parties (i.e. Suppliers, Customers and Sales Channels) with a risk based approach.

2.10 Reporting

All suspected violations of the Code of Conduct or any suspicious activities which may breach Accelleron policies, including this Anti-Corruption Policy, shall be reported by:

- Visiting the Accelleron SpeakUp reporting site: <https://accelleron.speakup.report/integrity>
- Calling the Accelleron SpeakUp Hotline: Numbers are available at: <https://accelleron-industries.com/integrity/speak-up>
- Writing to: Accelleron Integrity Office, integrity.office@accelleron-industries.com
- Writing to: Group Integrity Office, Accelleron Industries Ltd, Bruggerstrasse 71a, 5400 Baden, Switzerland

If you have any questions, need guidance or have grounds to believe that this Policy has been breached or may have been breached, you should promptly approach at least one of the following:

- a) Line Manager
- b) The Integrity Officer or a member of the L&I Team;
- c) Human Resources
- d) The General Counsel, the CEO or any member of the Executive Committee

2.11 Non-Compliance

Failure to comply with this Policy may lead to disciplinary measures proportional to the violation and may even lead to termination of employment depending on the particulars of a case, and claims for damages.

In addition, a violation of this Policy or anti-corruption laws by an employee can lead to severe consequences such as criminal prosecution as well as disciplinary measures and reputational damage for Accelleron and its employees.

2.12 Periodical Review

This Policy will be reviewed periodically following its implementation.

3. References

- Code of Conduct
- Global Travel and Expense Policy
- Gift, Travel & Hospitality Instruction
- Conflict of Interest Instruction
- Third Party Management Procedure
- Accelleron Registration & Qualification Policy

Revision	Approved by	Date	Revision notes
A	CEO	2022-10-03	Initial release
