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Anti-Corruption and Money-Laundering Prevention Policy

Bentley Endovascular Group AB (publ)

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1. INTRODUCTION

Bentley Endovascular Group AB (publ) (hereinafter “**Company**”; Bentley Endovascular Group AB (publ) as well as its subsidiaries hereinafter “**Bentley**”, the “**Group**” or “**we**”) is an international medical technology company with headquarters in Sweden and global subsidiaries.

Bentley Group is committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities. The Company has a strict Policy against bribery, corruption, fraud and money laundering, and is committed to acting fairly, with integrity and in compliance with laws in all its business dealings and relationships.

2. PURPOSE

The board of directors (the “**Board**”) of Bentley Endovascular Group AB (publ) has adopted this Anti-Corruption and Money-Laundering Prevention Policy (the “**Policy**”).

This Policy defines the Company’s position on any form of bribery, corruption, and money laundering, as well as provides guidelines to ensure that anti-bribery, corruption, fraud and anti-money laundering rules and Policy are aligned with the laws and regulations. This Policy shall be followed in all the countries where Bentley has operations.

3. SCOPE

The Policy applies to all permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, and suppliers. All employees and associated persons are expected to adhere to the principles set out in this Policy.

4. PRINCIPLE

4.1 Anti-corruption

4.1.1 This Policy provides an overview of Bentley’s commitment against corruption and bribery. Bentley’s code of conduct states that we apply and comply with the UN Global Compact’s ten principles for sustainable value creation. This Policy clarifies our ambition to fight corruption in all forms, in particular:

- Businesses shall work against corruption in all its forms, including extortion and bribery.
- Our ambition is to contribute to sustainable development through active and systematic work against corruption, extortion and bribery. The Group’s reputation depends upon how we conduct our business. We want our employees, customers,

business partners, suppliers, service providers and other stakeholders to be fully aware that we conduct our business in a responsible manner.

- 4.1.2 Bentley's ambition is to contribute to sustainable development through pro-active and systematic work against corruption, anti-bribery and conflicts of interest.
- 4.1.3 Of course, all applicable anti-Bribery and corruption laws, such as the U.S. Foreign Corrupt Practice Act (FCPA), UK Bribery Act and similar laws in every country in which the Group operates in, remain unaffected and Bentley is bound to such laws, as applicable. In case of discrepancies between this Policy and mandatory law, the stricter regulation shall apply.

4.2 Anti-bribery

- 4.2.1 Bentley has a zero tolerance of bribery of any sort in all its activities. This applies not only to the Group and its management, shareholders and employees but also to any of its customers, business partners, suppliers, service providers and other stakeholders. Any payment, benefit or other advantage that is offered, promised, given, accepted, or requested, with the intention of encouraging an action that provides for an unfair advantage, is considered as bribery. Minor gifts, meals and other such gestures of appreciation and invitations to seminars or business events in the ordinary course of business are usually seen as a part of normal business management intended to build and maintain fruitful business relationships, unless otherwise provided by law, policies or codes of the Group. In the operational legal entities Bentley has adopted the detailed "Code of Conduct for Sales and Marketing - Cooperation with healthcare professionals.", which all the Group personnel and distributors are required to comply with.
- 4.2.2 In uncertain situations, please consult with the local CEO, local CFO, EMT or legal counsel. Any suspicions about bribery should be reported to the whistleblowing function, and we ensure that the whistleblower will be kept confidential and have no disadvantage from that act. For more details refer to the Whistleblower Policy.

5. GIFTS AND ENTERTAINMENT

5.1 Gifts and business hospitality

- 5.1.1 It is customary within business culture that business partners give small gifts to those persons with whom they do business, for example at Christmas, at anniversaries and in connection with businesses. It is important, however, that such gifts do not affect receiver's business judgment or even give the appearance that judgment may be affected. Regulations in place at the recipient's place of work should be considered.
- 5.1.2 Generally, Bentley's employees and management must be very careful when providing and accepting gifts as pointed out in the section on anti-bribery. The Group employees may accept gifts from business associates, provided that the value of the gift is low and reasonable. This is the case, if the value and type of gift is usually accepted in the local business practice and does not exceed local common courtesy). In addition, the gift (or acceptance of the gift) may not create the appearance that person or company giving the gift is entitled to preferential treatment; it does not create the appearance that it would have an

impact on the recipient's or our business decisions (such as choice of supplier or service provider). Gifts should always be disclosed and made transparent to the superiors, so that no indication of receiving an unfair benefit happens.

- 5.1.3 Meals may be offered to business partners in a common, non-luxury setup from time to time, as long as (i) the purpose of the respective meeting is reasonable and business-related and (ii) the cost limits determined by the Group (if any) are not exceeded.
- 5.1.4 Bentley's employees shall never ask for gifts or other items that benefit them personally, regardless of value. Employees are expected to exercise good judgment in accepting gifts from suppliers, customers or other business associates. Cash or cash-like gifts are never acceptable. Employees should consult the local CEO, local CFO or EMT when in doubt as to whether a gift is appropriate.
- 5.1.5 Bentley reserves the right to change the rules on gifts and hospitality at any time.

5.2 Entertainment

- 5.2.1 Business entertainment (such as meals, tickets to the theatre or a sporting event etc.) can play an important role in strengthening and building working relationships among business associates. Accordingly, Bentley's employees may accept business entertainment offered or entertain or sponsor business associates for legitimate business purposes, such as building goodwill and enhancing relationships with customers or suppliers. Bentley's employees may not participate in such events where (i) applicable law or any Policy approved by the Group prohibits participation, (ii) the purpose is to provide someone undue preferential treatment (or if participating at the event can create the appearance that the relevant business associate is given undue preferential treatment); (iii) it has or can create the appearance that it would have an impact on any business decisions by the Group or its employee or the relevant business associate; or (iv) it is not reasonable and/or appropriate in the context of the occasion.
- 5.2.2 General events targeting people from several organisations at once can act as useful and good networking occasions and are as such generally more acceptable than events targeting one or several individuals from one organisation only. This general rule applies both for the Groups' employees as guests or for situations when we organize an event. All the Group employees are responsible for exercising careful consideration and good judgment in entertaining or accepting entertainment.
- 5.2.3 As a general guideline for employees, business breakfasts or business lunches are acceptable provided that the restaurant and the meal offered are not excessive considering all participants' normal business behaviour.
- 5.2.4 When it comes to any events occurring outside business hours or involving travel, the Group employees should always inform the superior, local CEO or local CFO. Invitations to any extraordinary trips where travel expenses are covered by the business associate hosting the event should be approved by the superior, local CEO or local CFO of Bentley before the invitation is accepted. Superior, local CEO or local CFO will consider whether such an event is in line with the Policy considering all relevant aspects of such an event, such as the purpose

of the event, other participants, assumed monetary value of the event and the business relationship between the host and the Group / the relevant the Group employee.

5.3 Interactions with healthcare professionals and Hospitals

Concerning interactions with healthcare professionals, specific regulations apply and must be strictly observed. Regarding such interactions, we have adopted the detailed “Code of Conduct for Sales and Marketing - Cooperation with healthcare professionals.” In addition, applicable law, regarding interactions with the public sector (e.g. public hospitals), must be observed and strictly complied with.

6. MONEY LAUNDERING PREVENTION

6.1 Money laundering is the act of concealing the source and disguising the nature of unlawfully obtained funds by making them appear legitimate. It can potentially occur in any business relationship, including those with customers, suppliers, and with other third parties where there are a transfer or receipt of funds. It is a criminal offense under, inter alia, EU, Swiss and US law. Bentley has zero tolerance for any acts that facilitate or assist money laundering and commits to fight against money laundering in any form.

6.2 Bentley complies with the applicable legal regulations. Bentley is aware of its legal classification as trader of goods from which apply certain obligations under the applicable money laundering prevention regulations. Applicable anti-money laundering prevention laws for the relevant Group subsidiary must be complied with, too.

6.3 Bentley has set up a risk analyses regarding money laundering prevention as required by applicable law, considering the limited obligations of traders in good in the absence of cash transactions. The risk analysis is updated regularly (once a year) and if necessary, also outside this interval (e.g. in the event of a change in the risk assessment or the legal framework). The current risk analysis assesses the risk for money laundering at Bentley low (inter alia due to absence of cash transactions in the Group’s business transactions and the medical device sector not being a high-risk sector in regard to money laundering).

6.4 Bentley provides instructions to employees involved in the Group’s business transactions regarding money laundering prevention (in particular avoidance of cash transactions and transactions with high-value goods). In addition, employees involved in the Group’s business transactions receive specific trainings on money laundering prevention as well as instructions on the recognition and the handling of suspicious cases (in particular know your customer principle and filing of suspicious activity reports).

7. ASSOCIATED DOCUMENTS

- Code of Conduct Policy
- Whistleblower Policy
- Code of Conduct for Sales and Marketing - Cooperation with Healthcare Professionals (Internal Policy)

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