

Anti-bribery and corruption policy 1:3

1. Policy and purpose

Syre Impact AB and its affiliates (jointly, “**Syre**”) have a zero-tolerance policy for any kind of bribery or corruption. High standards of ethical behavior and compliance with laws and regulations are essential to building a sustainable business, driving growth, and maintaining trust and integrity across all operations. It also plays a crucial part in protecting the reputation, credibility and long-term impact of our business.

The purpose of this policy is to define our standard for anti-bribery and corruption and to describe potential risk areas.

2. Scope

This policy applies to all Syre’s employees, board members, agents, and all other third parties acting on behalf of Syre such as its consultants, or joint venture partners (jointly, “**People and Partners**”).

This policy sets a minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, those higher standards must be followed.

This policy can be unilaterally withdrawn, adjusted, or amended by Syre at any time without prior notice.

3. Commitments

Bribery

Bribery in any form is strictly prohibited. This includes offering, promising, giving or accepting anything of value, to directly or indirectly influence a business decision or secure an improper advantage. This applies to both public officials and private sector counterparties.

Corruption

Syre is committed to combating the misuse or abuse of power for private gain.

Facilitation payments

Syre prohibits the making or receiving of facilitation payments, regardless of local customs or practices.

Facilitation payments are unofficial payments made to speed up routine actions or procedures that the payer is already entitled to.

Gifts, hospitality and expenses

Money, gifts or hospitality may influence or appear to influence decisions recipients make on behalf of Syre. Syre prohibits receipt or giving of gifts, hospitality and expenses, used to improperly influence a decision.

People and Partners must ensure that any gifts, hospitality or expenses are (i) reasonable and proportionate, (ii) transparent and properly recorded, and (iii) compliant with applicable laws and internal requirements.

Relationship with public or government officials, political contributions

People and Partners acting on behalf of Syre shall not offer or provide, directly or indirectly, any financial or other advantage to a government or public official to obtain or retain business or secure any improper business advantage.

People and Partners should not make any contributions to either individual politicians or political parties to secure influence on behalf of Syre. This does not prevent individual employees from making lawful private donations to political parties.

Third parties

Syre expects third parties acting on its behalf to adhere to equivalent anti-corruption and bribery standards. We take a risk-based approach to the selection and monitoring of third parties, including appropriate due diligence where necessary.

4. Conflicts of interest

People and Partners acting on behalf of Syre must disclose any actual or potential conflicts of interest involving individuals with personal or commercial interests that may conflict with those of Syre. Conflicts can arise from family ties, personal relationships, or anyone who could benefit from a decision or action in any other way.

Any Person or Partner who is, or may be, influenced by personal considerations that could hinder objective decision-making must disclose their concerns and report it to a relevant manager or Syre's Legal Team at legal@syre.com.

5. Compliance and Prevention

Reporting and non-retaliation

Concerns regarding suspected bribery or corruption should be reported promptly through Syre's reporting channels, including via Syre's whistleblowing channel, [Lumgo](#). Any employee who suspects or witnesses a breach of this policy or national anti-bribery or corruption law must disclose this concern and report it to a relevant manager, Syre's Legal Team at legal@syre.com or via Syre's whistleblowing channel, [Lumgo](#).

Syre prohibits retaliation against anyone who reports concerns in good faith.

Books and records

Syre maintains accurate books, records and accounts that reflect transactions in a complete and transparent manner. No undisclosed or unrecorded accounts may be maintained.

Training and compliance

Syre provides appropriate training and maintains procedures to support compliance with this policy. Violations may result in disciplinary action and, where applicable, legal consequences.

6. Non-compliance with this policy

All People and Partners are responsible for complying with this policy. Syre takes any breach of this policy seriously. Violations of this policy (including failure to report known or suspected breaches of this policy) may result in severe consequences, including termination of employment, suspension of business relationships or legal action.

Syre will assess all suspected breaches promptly, fairly and consistently. Investigations will be conducted with due regard for confidentiality, local legal requirements and the rights of individuals involved.

Version

1:3

Policy adopted by

Board of Syre Impact AB

Date of adoption	2026-04-15
To be reviewed	Annually
Policy owner	General Counsel