

A photograph of two business people shaking hands in a warehouse setting. The person on the left is wearing a light blue shirt and dark trousers. The person on the right is wearing a dark blue suit jacket. The background shows a large industrial building with a complex metal structure and a green floor. The text "casadevall group" is overlaid in white, lowercase letters.

casadevall group

Anti-corruption
and Bribery Policy

Casadevall Group Anti-Corruption and Bribery Policy

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Introduction

At Casadevall Group, we are committed to conducting business with the highest standards of integrity, firmly opposing all forms of corruption and bribery wherever we operate. We believe in competing fairly and solely on the merits of our services, ensuring that our actions reflect our core values and respect for the law. This policy outlines the fundamental principles and minimum standards required of all employees and representatives of Casadevall Group. It provides clear guidance on appropriate behavior, especially in situations where ethical boundaries may be unclear.

Scope

This policy applies to all employees, as well as third parties acting on behalf of or representing Casadevall Group, including agents, contractors, consultants, suppliers, and business partners. It encompasses all operations and locations where Casadevall Group conducts business. The policy is communicated to all personnel across all levels and locations, ensuring they are fully informed of its contents.

Zero-tolerance for corruption and bribery

Corruption and bribery, whether through direct or indirect payments, offers, or promises made to gain an improper business advantage—are prohibited under laws in every country where Casadevall Group operates. Regardless of local enforcement challenges, this policy applies consistently and sets a zero-tolerance approach toward any corrupt activity. Adhering to these standards not only protects Casadevall Group's reputation but also supports fair competition and responsible business practices.

All employees share the responsibility to ensure Casadevall Group's compliance with applicable anti-corruption laws and this policy. By doing so, we contribute to sustainable development, promote ethical business conduct, and safeguard the communities in which we work.

Conflict of interest

Conflict of interest occurs when personal interests interfere, or appear to interfere, with the objective and transparent decision-making required to protect the integrity of Casadevall Group. All business decisions must be made solely based on the legitimate interests of the company, free from any improper influence.

To uphold our commitment to ethical conduct and anti-corruption, all stakeholders within the scope of this policy must promptly disclose any actual or potential conflicts of interest to Raul Casadevall, CEO.

Examples of conflict of interest include, but are not limited to:

1. **Financial interests:** Having a significant financial stake in a competitor, supplier, or customer
2. **Personal relationships and close associates:** Supervising or making business decisions that directly affect a close relative or partner and could affect impartial decision-making. This includes, but is not limited to, supervising a relative, hiring a friend, or rewarding a contract to a business owned by a close associate.
3. **Outside employment:** Working for, or providing services to, a competitor, supplier or customer without prior written approval from management.
4. **Using company resources:** Using company time, equipment, or confidential information for personal business or any other non-company purposes.
5. **Gifts and entertainment:** Accepting offering gifts, hospitality, or other benefits that could be perceived as an attempt to influence a business decision.

Gifts and hospitality

At Casadevall Group, gifts and hospitality may only be offered, promised, or accepted when they serve legitimate business purposes and comply with this policy. Such activities should be reasonable in value and frequency, ensuring they do not create any obligation or appear to influence business decisions improperly.

Gifts or hospitality must never be used to secure or retain an unfair business advantage. Employees must exercise caution to avoid situations where these actions could compromise, or appear to compromise, their objectivity or the integrity of Casadevall Group's business relationships.

Facilitation payments and life-threatening situations

A facilitation payment refers to a small unofficial payment made to a public official or another party to expedite or secure the performance of a routine governmental or administrative action to which the payer is entitled.

Casadevall Group maintains a strict prohibition on the offering or making of facilitation payments under any circumstances. However, we acknowledge that in rare and urgent situations where an individual's health or safety is at immediate risk, such payments may be considered as a last resort to prevent harm.

If such an emergency payment is made, the employee or representative involved must promptly inform Raul Casadevall, CEO. This report should include a full account of the situation, the reason the payment was necessary, and the amount disbursed.

Sponsorships and donations

Sponsorship is when providing financial or in-kind support to an event or organization in exchange for promotional benefits. A donation is a voluntary contribution to a charitable cause or organization without expecting a commercial return.

All sponsorships and donations must be transparent, lawful, and must never serve as a means to conceal bribery or undue influence. A formal application for any such contribution must be submitted for prior approval, and proper records must be kept. Casadevall Group supports only legitimate and reputable causes aligned with our values. Any concerns that a sponsorship or donation could be used improperly must be reported immediately to Raul Casadevall, CEO.

Interacting with government

Interactions

Casadevall Group staff must limit engagement with government officials - defined as employees or representatives of government departments, agencies, or public institutions - to occasions that are necessary and grounded in legitimate business reasons. Except for routine communications conducted as part of normal business operations, employees must document meetings, recording details such as the date, location, purpose, attendees, and any decisions or next steps.

Contributions

Any support or donations to political parties, candidates, or campaigns, whether given directly or indirectly, are considered political contributions. These may raise concerns of undue influence or be viewed as improper payments. Casadevall Group strictly prohibits political contributions unless specifically authorized by the Group CEO.

Books and records

Employees at Casadevall Group are prohibited from creating or authorizing any false, misleading, or incomplete records. All business transactions must be accurately recorded to reflect their true nature and purpose.

To prevent bribery, kickbacks, or other improper payments, all financial and business records must fairly represent every transaction involving Casadevall Group or the use of its assets. The use of secret, unrecorded, or misrepresented accounts is strictly forbidden.

Expenses must be supported by appropriate documentation, accurately recorded, and entered into company records promptly before any reimbursement is made. Payments made to third-party intermediaries or agents acting on behalf of Casadevall Group must be clearly identified and documented in all relevant financial reports.

Third parties

Casadevall Group is responsible for ensuring that all business conducted through third parties comply fully with applicable laws and this anti-corruption policy. Casadevall Group must not use third parties to circumvent legal or ethical standards that apply directly to the company.

Third parties include any external individuals or entities engaged by Casadevall Group, such as consultants, distributors, or other partners who act on behalf of or represent Casadevall Group. We require that all third parties adhere to ethical standards consistent with our own and comply with relevant international and local laws.

Before engaging with third parties—particularly those operating in high-risk regions characterized by elevated corruption risks, weak governance, or political instability—we will conduct due diligence, including checking ownership, reputation, anti-corruption compliance, and financial practices. Where needed, we will perform background checks and verify compliance certifications.

Obligation to report

All employees at Casadevall Group are required to report any known or suspected violations of anti-bribery and corruption laws or this policy. This includes any actual or potential breaches, ongoing investigations, legal convictions, or fines related to such matters.

Employees who have concerns or doubts about possible misconduct by any individual within Casadevall Group or by third parties acting on behalf of the company are strongly encouraged to raise these issues without delay. Reports can be made through our global confidential whistleblower channel, in local languages.

Casadevall Group ensures that reports may be submitted anonymously and strictly prohibits any form of retaliation against employees who report concerns in good faith.

Sanctions

The safety and integrity of our business depend on strict adherence to this Anti-Corruption and Bribery Policy. Any violation of this policy will not be tolerated and will result in serious consequences. Disciplinary actions may include termination of employment or contracts, legal action, and reporting to relevant authorities. We are committed to enforcing this policy consistently to protect our reputation and maintain a culture of ethical conduct and compliance.

Policy revisions and governance

The policy will be reviewed and updated periodically to remain aligned with evolving knowledge on anti-corruption and bribery matters and regulatory frameworks.

Questions or requests for clarification can be directed to the owner of this policy.

Public policies

For more details on Casadevall Group's publicly accessible policies, including our commitment to providing a safe and healthy working environment for employees as well as how we address mitigation of greenhouse gas emissions and waste management, please visit:

- Casadevall Group Climate Policy
- Casadevall Group Resource and Waste Management Policy
- Casadevall Group Material Standard and Responsible Sourcing Policy
- Casadevall Group Health and Safety Policy
- Casadevall Group Code of Business Conduct for Employees and Contractors
- Casadevall Group Anti-Corruption and Bribery Policy
- Casadevall Group Global Inclusion and Belonging Policy
- Casadevall Group Responsible Marketing Standard
- Casadevall Group Whistleblower Policy

Policy owner

This Anti-corruption and Bribery policy is owned by Helene Liebst von Obelitz, Head of Sustainability and Creative Transformation and approved by Raul Casadevall, CEO.

Inquiries pertaining to our policies, actions and targets for the group should be send to Helene Liebst von Obelitz, Head of Sustainability and Creative Transformation, helene@casadevallgroup.com

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Approved by: Helene Liebst von Obelitz, Head of Sustainability and Creative Transformation and Raul Casadevall, CEO