

Antitrust and Fair Competition Policy

1. Purpose

VBN Components AB is committed to conducting all business activities in strict compliance with applicable antitrust and competition laws. This policy outlines our commitment to fair competition and ensures all employees and representatives understand and uphold our legal and ethical obligations.

2. Scope

This policy applies to all employees, officers, board members, contractors, consultants, and agents acting on behalf of VBN Components AB, across all jurisdictions in which we operate.

3. Prohibited Activities

All employees and representatives must refrain from engaging in activities that may violate antitrust or competition laws. Prohibited actions include, but are not limited to:

- Price fixing – agreeing with competitors to set or maintain prices.
- Bid rigging – colluding with competitors to manipulate tender processes.
- Market or customer allocation – agreeing with competitors to divide customers, markets, or territories.
- Group boycotts – agreeing with others to refuse to deal with a particular customer, supplier, or competitor.
- Exchange of sensitive information – such as pricing, costs, margins, or strategies with competitors, outside of lawful and controlled frameworks.

4. Compliance Commitment

VBN Components AB adheres to all applicable antitrust and fair competition laws in Sweden, the EU, and other jurisdictions where we conduct business. We expect all employees and representatives to demonstrate full compliance with these legal standards.

5. Reporting Concerns

Suspected antitrust violations must be reported immediately. Reports will be handled confidentially and without retaliation. Reporting channels include:

- Your direct manager or supervisor
- The CEO or board chair

6. Consequences of Non-Compliance

Violations of this policy or of antitrust laws may result in:

- Disciplinary action, including termination of employment or contract
- Civil and criminal liability for the individual involved
- Significant financial and reputational damage to VBN Components AB

7. Training and Awareness

All relevant personnel will receive antitrust and fair competition training appropriate to their role during onboarding. Management is responsible for promoting ongoing awareness and compliance.

8. Questions and Guidance

Questions about this policy or about antitrust compliance should be directed to your manager or the CEO. When in doubt, do not proceed and seek guidance.



Magnus Bergman, CEO, VBN Components AB