



Amer Sports Group

# Anti-Bribery and Anti-Corruption Policy

January 2024

## **PURPOSE AND SCOPE**

This Anti-Bribery and Anti-Corruption Policy (“Policy”) outlines and defines the principles, roles and responsibilities pertaining to anti-bribery and anti-corruption practices in Amer Sports Group (“Amer Sports”) to prevent and detect possible bribery and corruption. Amer Sports has zero tolerance on all forms of bribery and corruption. This is also recognized in Amer Sports’ Code of Conduct which has been approved by the Board of Directors of Amer Sports, Inc. (the Company).

Amer Sports and all its Employees must comply, in addition to this Policy, with all local applicable anti-bribery and anti-corruption laws and regulations in every country where Amer Sports does business. In case of conflict with any applicable law, the law shall prevail. Certain applicable laws, for example the UK Bribery Act of 2010 and the US Foreign Corrupt Practices Act, have extra-territorial reach. This means that potential corrupt acts and bribery can lead to prosecution in the UK or USA even if such acts took place outside these countries.

## **APPLICABILITY, RESPONSIBILITY AND EFFECTIVE DATE**

This Policy must be followed by everyone working for Amer Sports worldwide. Therefore, this Policy applies to all directors, officers, and employees within Amer Sports (“Employees”). Amer Sports expects our business partners such as agents and consultants acting on our behalf (“Business Partners”) to respect and to follow this Policy.

The Company’s Board of Directors has approved and the Group General Counsel is the owner of this Policy. The Group General Counsel is responsible for conducting oversight of the Policy and ensuring that the Policy is introduced and communicated to all Employees.

The primary responsibility for the implementation of the Policy in daily business is with the brand and function heads.

This Policy is effective as of January 31, 2024.

## **PROHIBITION ON CORRUPTION AND BRIBERY**

Amer Sports has zero tolerance for bribery and corrupt activities, and all Amer Sports Employees and Business Partners are strictly prohibited from engaging, directly or indirectly, in corrupt acts and bribery.

Do not offer, promise, pay, give, or authorize the giving of anything of value (such as gifts, business entertainment, discounts, meals, travel, goods, services, jobs for relatives, or charitable contributions) directly or indirectly (through a third party) to any Public Official or to anyone (whether or not a Public Official) to influence a business or official decision and/or obtain or retain business or any advantage. This prohibition applies regardless of whether the payment is called a grease, facilitation, or expediting payment (e.g., small payments to facilitate routine, non-discretionary governmental actions) and specifically includes giving things of value to any third party while knowing or being aware of a high probability that the third party will, in turn, promise or provide a benefit prohibited by this Policy.

## KEY DEFINITIONS

**Anything of Value** – Any item of tangible or intangible value, broadly defined, in any form, including but not limited to cash, cash equivalents (such as gift cards, gift certificates and merchandise discounts), loans, gifts, travel, lodging, entertainment, meals, expense reimbursements, per diems, favors, business or employment opportunities, compliance with a request to provide a thing of value to a third person (such as a relative of a Public Official), contributions to a charity or other non-profit organization and promotional sponsorships.

**Public Official** – Refers to (i) any public or elected official, officer, employee (regardless of rank), or person acting on behalf of a national, provincial, or local government, department, agency, instrumentality, state-owned or state-controlled company (including state-owned factories), public organization, political party or entity that is financed in large measure through public appropriations, is widely perceived to be performing government functions, or has its key officers and directors appointed by a government and (ii) any party official or candidate for political office or any person acting on behalf of such party official or candidate for political office. Examples include: issuers of government permits, approvals or licenses; airport authorities; state-owned factories or other businesses; customs; immigration or tax officials or ministers or representatives of foreign governments.

**Business Partners** – Third parties engaged by Amer Sports or any entity owned or controlled by Amer Sports who are expected to interact with Public Officials on behalf of the Company or any venture in which Amer Sports has an economic interest, such as agents, brokers, intermediaries, advisors, consultants, representatives, joint venture partners, co-investors, franchisees, licensees, travel agents, freight forwarders, customs agents, tax advisors, law firms, finders, lobbyists, and accountants.

## BOOKS AND RECORDS

Amer Sports requires that a system of adequate internal accounting controls be maintained and that individuals report and reflect all transactions fairly, accurately and in reasonable detail in Amer Sports' books and records. Our books and records must not contain any false or misleading statements or entries, such as recording a gift expense as something other than a gift. Never intentionally misclassify any transaction as to accounts, departments or accounting period. Maintain accurate, appropriate and reasonably detailed documentation to support all transactions, and preserve documents in accordance with Amer Sports' records and information management policies.

Any and all payments made to Business Partners, including commissions, compensations, or reimbursements, must be customary and reasonable in relation to the services provided and accurately documented in Amer Sports' books and records.

## GIFTS AND BUSINESS ENTERTAINMENT

Gifts, entertainment or other hospitality may be acceptable if they are reasonable and where there is no risk of influencing or creating the perception of influencing the recipient(s) in their decision. It is not always easy to identify whether providing or accepting certain gifts, entertainment or other

hospitality would be considered as a corrupt act or bribery under applicable laws or this Policy. Therefore, all Employees must always be very careful when offering and receiving gifts, entertainment and other hospitality as these might raise concerns about corruption or bribery – in particular, when dealing with Public Officials.

When deciding whether a gift, entertainment or other hospitality is appropriate, the following shall be taken into consideration:

- **Purpose and timing:** Acceptable gifts, entertainment and other hospitality shall have a clear and legitimate business purpose and shall be in accordance with applicable laws and the customary local business practice. When gifts, entertainment or other hospitality are offered prior to a decision on entering into or renewing a contract, they present a heightened risk of being perceived as corruption. No expectation shall be created that gifts, entertainment or hospitality are given in exchange for any return favor or business advantage.
- **Value:** Employees are expected to follow common sense when giving or accepting gifts, entertainment or other hospitality. The value shall not exceed what is proportionate in the local context and customs. Unsolicited gifts, entertainment or other hospitality may only be accepted if they do not go beyond common courtesy and are accepted in the normal course of local business practice.
- **Type:** Lavish or inappropriate gifts, entertainment or other hospitality are strictly prohibited. Gifts must not be in the form of cash, regardless of the amount or the recipient.
- **Frequency:** Gifts, entertainment or other hospitality shall be infrequent and not be given on a regular basis.

**Pre-Approval Requirements** – Prior approval in writing must be obtained for the activities listed below, by submitting the Gifts and Hospitality Pre-Clearance Form (attached hereto as Exhibit A) to Chief Compliance Officer (compliance@amersports.com):

- Offering or giving any gift, business entertainment (including meals, travel, lodging, entertainment, participation in recreational activities or events, and tickets, passes or other access to cultural or sporting events), or any other thing of value to a Public Official, regardless of the amount;
- Offering or giving any gift (other than cash equivalents, discounts or rebates), business entertainment, or any other thing of value above \$200 to a private (i.e., non-Public Official) third party;
- Offering or giving a gift of cash equivalents (such as gift cards, gift certificates and merchandise discounts) or discounts or rebates to a third party in deviation from policies and guidelines issued by the brands, regardless of the amount or recipient;

- Offering or giving a gift or gifts (other than cash equivalents, discounts or rebates) valued above \$500 in total per calendar year to a third party;
- Offering or giving anything of value to a third party if there is any risk that the frequency or value to be provided (alone or when combined) to the same person(s) could be viewed as anything other than occasional and reasonable, when measured against local norms; and
- Making political or charitable contributions, or engaging in political activities, other than on your own time, on your own behalf and from your personal funds as a private citizen.

Employees must not use personal funds or a third party to circumvent the requirements of this Policy.

Demanding or soliciting gifts, entertainment or other hospitality is prohibited. This includes not only tangible items but all kinds of advantages.

All Employees are personally responsible to ensure that a gift, entertainment or other hospitality is permissible under this Policy and applicable laws.

## **THIRD-PARTY BUSINESS PARTNERS**

Amer Sports will not engage or do business with a Business Partner if Amer Sports believes there is a material risk that the Business Partner will violate anti-corruption laws or the prohibitions in this Policy.

**Pre-Approval Requirements** – Prior to entering into a business relationship with any Business Partner who will interact with Public Officials on Amer Sports' behalf, pre-approval must be obtained in writing from Chief Compliance Officer (compliance@amersports.com), who is required to:

- Perform a risk assessment and due diligence on the proposed Business Partner –
  - Complete the Business Partner Pre-Clearance Form (attached hereto as Exhibit B);
  - Conduct media searches (in English and local language), sanctions checks and other Internet-based searches to assess corruption risk;
  - If necessary given the risk profile, commission an enhanced due diligence report from an independent service provider, and conduct a public records search.
- Ensure that the contract with the Business Partner contains anti-bribery representations and warranties in the form contained in the Model Anti-Corruption Laws Provisions for Business Partner Agreements (attached hereto as Exhibit C), including confirmation that the Business Partner understands and agrees to abide by this Policy and Amer Sports' right to terminate the contract in the event of breach;
- Explain Amer Sports' expectations about compliance with anti-corruption laws and this Policy to the Business Partner and maintain a record of having done so; and

- Maintain all records related to the due diligence and engagement of the Business Partner.

Employees who are responsible for the Amer Sports entering into an arrangement with a Business Partner are accountable for the actions of the Business Partner.

## **PUBLIC OFFICIALS AND POLITICAL CONTRIBUTIONS**

Amer Sports interacts with Public Officials in an open and transparent manner, and never seeks to improperly influence a Public Official or to create an expectation of special treatment.

Amer Sports does not provide, either directly or indirectly, financial support to political parties or political groups. Amer Sports Employees keep their political activities clearly separated from the work.

## **EMPLOYEE RESPONSIBILITY AND COOPERATION**

All Employees are required to (i) carefully read and comply with this Policy; (ii) conduct mandatory trainings; (iii) communicate this Policy to Amer Sports' Business Partners where applicable; and (iv) immediately after discovering or suspecting a violation of this Policy report to their line manager or report by using Amer Sports' confidential and anonymous reporting lines.

Failure to follow the principles outlined in this Policy will be taken seriously and can result in disciplinary action, dismissal or even criminal charges.

Employees can ask any questions related to this Policy from and raise concerns to their line manager, their Human Resources Business Partner, to legal or internal audit functions or through the Amer Sports' confidential and anonymous reporting line.