



# BRIBERY AND CORRUPTION POLICY

Adopted by the Board of Directors of Samhällsbyggnadsbolaget i Norden AB ("SBB") on 2023-04-28

Revised 2022-04-27

## Introduction

SBB is committed to ethical and transparent business free of bribery and corruption.

Bribery is defined as attempts to gain advantages by giving someone money, presents, or something else that they want.

Corruption includes a wide variety of illegal or dishonest behaviour, especially by people in positions of power. Examples of such is: misuse of power for personal gain, bribery, and misuse of company assets.

Bribery and corruption can take many forms and include groups of people as well as individuals.

## Our Principle

SBB will never participate in improper transactions such as bribes or facilitation payments. No employee, contractor, or sub-contractor should participate in paying or receiving bribes or in any way participating in, or expressing acceptance towards extortion, fraud, embezzlement, illegal financing of political parties, facilitation payments or other business benefits in exchange for gifts or personal favours. All employees should be cautious and take responsibility for ensuring that bribery and corruption is prohibited.

SBB will not participate in financing political parties or political lobbying on national or EU-level. All memberships in industry organizations such shall be disclosed publicly.

The above is clearly stated in our Code of Conduct that all employees, contractors, suppliers, and business partners are obliged to understand and sign.

Any employee, contractor, supplier, or business partner can seek guidance from SBB's management if in doubt regarding appropriate behaviour in any given situation.

SBB's senior management team is responsible for ensuring that no corruption or bribery of any kind occurs within the organisation and that contractors, suppliers and business partners understand and respect SBB's practices. The SBB Board of Directors have a responsibility to follow up this work, more information on this can be found in the yearly Corporate Governance Report that is part of the Annual Report.

## Breaches

Any breaches of this Policy should be reported to your manager, your manager's manager or through our whistleblowing service described in our Whistleblowing Policy. One should always be given the possibility to report breaches anonymously.

Reported or suspected breaches are taken seriously and are investigated accordingly. Confirmed breaches of this Policy will be met by disciplinary actions such as warning, dismissal, or reporting to the police.

## Examples of Behaviour that Constitute a Breach of this Policy



- Selecting a supplier with whom you have a personal relationship because you expect personal favours in return and/or have been given personal favours prior to the deal.
- Giving, or receiving gifts to or from a customer, or supplier, that exceeds the reasonable value defined in the Code of Conduct and/or could affect business transactions (business benefits in exchange for personal services)
- Giving a financial donation to a non-profit organisation such as a political party with expectations of business benefit in return (political lobbying)
- Unofficial or questionable payments to officials to speed up bureaucratic processes (facilitation payments)

Deliberately trying to deceive another party or abuse a position of power to gain material advantage (fraud)

Read in conjunction with:

- SBB Code of Conduct
- SBB Whistleblower Policy