



# Anti-corruption policy

**Studsvik**

# Anti-corruption policy

All Studsvik personnel are to conduct company business in a legal and good ethical manner. Studsvik must not use illegal payments, bribes, kick-backs or other questionable inducements to influence any business transaction. In addition, Studsvik employees must not directly or indirectly request, agree to receive or accept money or anything else of value, from any person or entity where it is designed to influence an action or to obtain an improper advantage.

Studsvik has a policy of zero tolerance of corruption.

Studsvik must always follow both Swedish legislation as well as local legislation. If there is a discrepancy, concerning anti-corruption, the stricter legislation must be followed.

## Aim

The purpose of this policy and related governing documents is to provide further guidance to the standards of conduct regarding corruption as set out in the Group's Code of Conduct.

## Scope

This policy applies to all of the company's operations, including those conducted by any of Studsvik's subsidiaries, agents, distributors, or other representatives and any joint venture in which Studsvik is a participant.

Studsvik's reputation depends on how we conduct business. All employees, business partners and agents of our company must comply with all applicable laws and regulations in any location in which we transact business.

We want our business partners, agents and employees to know that we conduct our business in an ethical manner. If a non-ethical practice is acceptable in a country does not mean it is acceptable to Studsvik.

Non-compliance with this policy can have very serious consequences for Studsvik. Compliance with this policy and governing documents issued by Management is mandatory.

As employee of Studsvik you are urged to read Studsvik's Anti-corruption regulations carefully. If you suspect that Studsvik does not comply with this policy or applicable laws in your country, you must alert your manager, other management representative or follow our Whistleblower policy.

## Compliance

It is the responsibility of Studsvik personnel, agents, distributors, or other representatives to at all times abide by all laws, regulations and international conventions applicable in the countries in which Studsvik operates or with which Studsvik personnel, agents, distributors, or other representatives may otherwise come into contact. Lack of knowledge about applicable rules and regulations is never an excuse.

It is never in the interest of Studsvik to violate this policy. Compliance with this policy is mandatory and failure to comply will be a disciplinary offence.

## Areas with exposure of corruption

The essential elements of anti-bribery laws consist of a payment, offer, or promise of anything of value to any person in a position to influence a purchase decision or other outcome of exercise of power. It is also granting of favour while knowing that all or part of such decision or outcome of exercise of power will be passed on to persons influencing such decisions.

There are few limitations on what can be regarded as "anything of value". In addition to cash or some other form of monetary consideration it can be almost any form of direct or indirect benefit.

The areas below are identified as examples of areas with potential risk for corruption:

### Sales

Studsvik only competes in fair business and shall not be included in unethical or illegal activities.

### Business representatives

According to Swedish legislation, Studsvik may find itself liable for business representative's actions.

### Gifts, hospitality and expenses

Shall be transparent, proportionate and modest in nature. Value shall not exceed any amounts specified by relevant local law or other local practices.

### Facilitation payments

Studsvik does not permit facilitation payments.

### Procurement, contracting and purchasing

All Studsvik representatives who are involved in the awarding of any contract to a supplier shall comply with Studsvik's procedures covering the evaluation, appointment and management of suppliers. As a minimum, terms of delivery must include requirements according to the appendix of this policy\*.

### Mergers, acquisitions, selection of agents and joint ventures

Studsvik must ensure that the due diligence process carried out determine if the target company presents any present or future risks in relation to anti-corruption.

### Human resource

Studsvik representatives shall assess possible risks for conflict of interests, as well as non-compliant compensation and bonuses.

## Studsvik corporate complaints procedure, Whistleblower policy

If you need to report an incident you shall contact your manager and discuss the incident with him/her.

If for various reasons this is problematic you shall follow the recommendations in the Studsvik Whistleblower policy.

## Responsibility and monitoring

The Chief Financial Officer is responsible for the maintenance and implementation of this policy and related governing documents. Feedback on this policy can be discussed with the Chief Financial Officer, as your feedback will be welcomed.

Studsvik has introduced a variety of controls across the Group in order to monitor compliance with this policy and related governing documents to highlight any failures to comply. Monitoring and audits apply to all anti-corruption activities within Studsvik, to business partners and other business relationships.

\* Terms of delivery-Appendix Anti Corruption with document ID 23777



