



# ANTI-CORRUPTION POLICY

*Governing Document*  
*Coor Group*

JULY 9, 2021

*This is a governing document:*

# POLICY

## *Anti-Corruption Policy*

### INTRODUCTION AND PURPOSE

The objective of this policy (the “Policy”) is to define Coor’s standpoint on corruption.

Coor does not tolerate any form of fraud, bribery or corruption, including money laundering. Corruption and bribery in any form damages the trust and confidence our coworkers, customers, suppliers, shareholders and other stakeholders have in us. In addition to harming our brand and reputation, failure to comply with anti-corruption laws have significant legal and financial consequences for Coor, as well as personally for any individual who engages in corrupt business practices.

Never  
compromise on  
ethics when doing  
business.

### SCOPE

This Policy applies to all employees, directors and business partners acting on behalf of Coor.

This Policy does not address every situation you may encounter in your daily work. If you have any concerns or questions relating to bribery matters, contact Coor’s General Counsel Erik Strümpel, [Erik.Struempel@coor.com](mailto:Erik.Struempel@coor.com).

### ROLES, RESPONSIBILITY AND REVIEW

Coor’s General Counsel is the document owner of this Policy and is responsible for the content. The General Counsel is also responsible for maintaining and updating this Policy, and for ensuring that it is properly published and enforced. The Policy is annually reviewed and approved by the Executive Management Team.

Members of the Executive Management Team are responsible for communicating and implementing this Policy, and for ensuring that all employees within their area of responsibility are familiar with and follow this Policy.

All Coor employees are individually responsible for reading, understanding and following this Policy when applicable. Each employee is encouraged to raise concerns about actual and possible violations of this Policy as set out below in Section 5.

### OTHER REGULATIONS

This Policy is based on applicable anti-bribery legislation. Coor’s rules are more stringent than applicable legislation, which means that employees complying with the Policy should be able to trust that they do not risk contravening applicable legislation.

Coor shall comply with applicable sector regulations (Sw. *branschregler*) regarding anti-corruption, provided such regulations do not contravene the Policy. This Policy shall

supersede sector regulations and sector practice. However, there is nothing to prevent sector regulations and sector practice from being more stringent than this Policy.

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## 1. WHAT IS PROHIBITED?

Coor prohibits bribery and corruption in all forms and in all of Coor's business dealings and relationships. At all times, Coor employees must exercise good judgment and make every effort to avoid situations that may lead to suspicion or the appearance of corrupt behavior. Even the appearance that something could involve corruption or bribery can have a negative impact on the Coor brand and damage the public's trust in Coor.

No employee will suffer negative employment consequences for refusing to pay or accept bribes or engage in corrupt practices, even if such refusal may result in Coor losing business.

### 1.1 BRIBERY

Bribery occurs when a person offers or gives (or asks for, accepts or receives) something of value in order to influence a transaction or decision improperly. All actions of this type are illegal.

A typical example of a bribe is when a supplier offers money or other forms of payment to a company employee, in order to gain business from the company. Another example is offering a gift or hospitality to an employee with the intention of unduly influencing him/her to take a particular action. However, a bribe or improper advantage can take many forms – in principal anything of value – including e.g. paid expenses, loans, discounts, kickbacks, personal benefits, accommodation.

Even the smallest thing could be improper depending on the situation. Factors such as the relationship between the parties involved, the frequency of the benefit, and whether it is given in a transparent manner matter or not.

## 1.2 GIFTS

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Business gifts should be gestures of goodwill, and never rewards for doing business with Coor. Gifts of limited nominal value or company branded products are normally permitted, as long as the gifts are reasonable and justifiable, and not intended (or perceived) to influence the receiver in his/her decision-making. Likewise, you must never accept or receive a gift which is intended (or perceived) to influence your decision-making at Coor.

### 1.2.1 UNACCEPTABLE GIFTS

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Offering or receiving the following type of gifts is always unacceptable:

- Gifts in the form of cash including cash equivalent vouchers and gift certificates
- Expensive/luxury items
- Gifts that create a dependency such as loans or personal services
- work carried out on behalf of the recipient, or delivery of goods or services for private use that is not on market terms,
- anything that is conditional on receiving a service in return and which has not been approved by the recipient's employer.

## 1.3 HOSPITALITY

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Coor permits reasonable, justifiable and appropriate hospitality (whether given or received). Social gatherings with business partners, such as meals, cultural events or sporting events, constitute a legitimate part of Coor's business, and of building business relations. Entertainment and events may, however, never be used to attempt to influence the decision or gain an unfair advantage.

As a general rule you are allowed to arrange or attend events and business trips provided:

- There is a legitimate business reason for the hospitality
- The business partner is present and the cost and duration of the hospitality is kept within reasonable limits and in line with normal standards, and
- The hospitality is given/accepted openly and between companies, not between persons.

### 1.3.1 UNACCEPTABLE HOSPITALITY

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Be cautious with the following types of arrangements:

- Hospitality that includes partners/spouses and other family members
- Invitations that you believe not have a real business agenda
- Hospitality that is not transparent and could be perceived by others as intended to influence business decisions
- Hospitality shortly before or during ongoing contractual negotiations

These types of hospitality are likely to be unacceptable or inappropriate. Consult your line manager or the General Counsel before you offer or accept such hospitality.

Offering or receiving the following types of hospitality is always unacceptable:

- Hospitality offered for something in return
- Private use of vehicles, boats, leisure properties or similar
- Leisure travel or holidays paid for
- Offers that are generally considered to be unethical, such as visiting strip clubs.

## 1.4 FACILITATION PAYMENTS

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Coor does not permit facilitation payments. In addition, it is illegal in most countries to make such payments, which means that an individual involved risks prosecution and punishment.

Facilitation payments are typically small amounts paid unofficially to public officials to secure or expedite a routine action or process such as e.g. the issuing of a visa, permit or license. Lawful payments to a government agency are not facilitation payments.

## 1.5 PUBLIC SECTOR

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Coor does not permit gifts or hospitality to or from public officials. This prohibition is absolute and applies without exception.<sup>1</sup> Many countries stipulate strict rules and regulations about gift/hospitality and respect to public officials and public officials are also subject to their own strict rules about what they may receive.

## 1.6 POLITICAL DONATIONS AND CHARITABLE CONTRIBUTIONS

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Coor does not permit political donations or charitable contributions that could be interpreted as a substitute for political payments.

# 2. CORRECT OFFERING AND RECEIVING OF GIFTS AND HOSPITALITY

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The provision of any sort of benefit, such as gifts or hospitality, to a public sector employee, is strictly forbidden. Certain types of gifts and hospitality are also forbidden, as set out above in sections 1.2.1 and 1.3.1. Coor may, however, provide gifts or hospitality to employees of a privately owned company under certain circumstances.

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<sup>1</sup> This does not prevent Coor employees from offering e.g. coffee or a light lunch during a work meeting with representatives of an existing public sector customer, provided that these rules otherwise are adhered to (e.g. in section 3.1.1 and 3.1.2). As an example, a boxed salad during a meeting is permitted, but not a three-course lunch or dinner at a fancy restaurant.

The basic requirements for permissible gifts or hospitality are transparency and moderation – and that it not otherwise could be considered to influence behavior.

### 2.1.1 TRANSPARENCY

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The requirement for transparency means that a benefit must either be directed at the recipient's employer or principal or comply with its established policy on benefits.

### 2.1.2 MODERATION

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Whether a benefit is moderate is determined primarily by the financial or personal value of the benefit to the recipient. If several benefits are offered to the same employee or contractor, those benefits must be assessed in context. When it comes to assessing whether a benefit is moderate, the following circumstances should be considered:

#### RECIPIENT

A benefit provided to a single individual or a limited group of people is more likely to be considered inappropriate, than something aimed for a larger group of people. Moreover, certain professional roles with specific public trust (e.g. banks, financial and insurance companies, journalists, auditors etc.) are considered particularly sensitive.

#### TYPE OF BENEFIT

The risk of a benefit being considered improper increases with the economic or personal value of the benefit, as well as to the number of benefits given to the same recipient. Even smaller benefits that are offered frequently could be prohibited, as well as benefits that can be used privately.

#### BUSINESS RELEVANCY

The benefit should be serious and clearly connected to your work. Events should have a clear and mainly business-related agenda.

#### TIMING

Are we (or are we soon to be) in ongoing procurement with the other party, you must be particularly restrictive.

#### CAUTION

If in doubt, raise the issue with your manager. If you thereafter still are not sure whether the activity is appropriate, refrain.

## 2.2 AMOUNT THRESHOLD

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A gift or hospitality provided to a representative of a privately-owned company may not exceed a value corresponding to SEK 1,000 excluding VAT. However, the benefit must always comply with the requirements indicated above in Sections 3.1.1 to 3.1.2.

## 2.3 RECEIVING BENEFITS

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The reverse of the statements contained in this Policy regarding Coor employees providing benefits shall apply to Coor employees receiving benefits.

If a Coor employee makes the assessment that a benefit offered could be considered to be non-permitted, such individual should either immediately reject the benefit offered, or, before it is received, refer the assessment to Coor's General Counsel.

In the event of unforeseen or suddenly arising circumstances, where an immediate refusal of the benefit is out of the question as it would be damaging to the relationship between the companies, the benefit shall, as soon as circumstances allow, be reported to the recipient's line manager for information and evaluation.

## 2.4 REPORTING/REGISTRATION OF BENEFITS

All gifts and hospitality paid for by a Coor employee shall be duly registered in the relevant expense reporting system (as locally applicable, e.g. Aditro in Sweden). In your expense report, make sure to state:

- full name and employer of each participant (external guests as well as internal Coor personnel);
- description of the occasion/purpose and work connection (relevant project, contract etc.);
- any other relevant information.

Group Legal may follow up expense reports, e.g. in order to monitor frequency and aggregated amounts of benefits given to individual persons.

## 3. KNOWING OUR BUSINESS PARTNERS – ANTI-CORRUPTION AND ANTI MONEY LAUNDERING

Coor expects their customers, consultants and business partners to conduct their businesses in accordance with applicable law, the principles outlined in this Policy, and Coor's Code of Conduct.

It is important that our partners, including agents and other collaboration partners, are carefully selected and that the integrity of the partner is verified in order to mitigate the risk of corruption. If reviews of contemplated partners are insufficiently performed, criminal liability may arise, such as for negligent financing of bribery. Before concluding an agreement with an agent or other collaboration partner, written approval from Coor's General Counsel shall be obtained, and a written contract with the partner must be established. The compensation must be reasonable, and unusual payment procedures shall be avoided (e.g. payment of large sums in cash). This also means that all payments must be properly documented and accounted for, and the payment must be clearly linked to the goods and/or services provided by the partner.

To prevent money laundering and/or other illegal practices, it is important to be attentive to and challenge unusual behaviors by our customers, suppliers and other partners who wish to do business with us. Money laundering means exchanging money or assets that were obtained criminally (e.g. by fraud, drug trafficking, robbery, etc.) for money or other assets that are "clean". You should look out for "red flags" such as payment from a third party who has no obvious link to the transaction; customers or company representatives

not able to present proof of their identity; or pressure from a business partner to accept the business before you have had the time to carry out the necessary background check.

## 4. CONFLICTS OF INTEREST

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Conflicts of interest are situations in which an individual has competing interests, financial or otherwise, and serving one interest could involve working against the other interest. As a Coor representative, it is important that all employees avoid and withdraw from any situation where a relationship with another organization or person could influence your ability to make sound business decisions. Even the appearance that a Coor representative's ability to make sound business decisions is compromised could damage his/her and Coor's reputation. All Coor representatives must avoid conflicts between personal interests and Coor's business operations and disclose those kinds of situations. Any potential Conflict of Interest should be reported to Group Legal via CoorNet/Our Way of Working/Legal/Group Policies/Code of Conduct.

## 5. BREACHES & REPORTING

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Each Coor employee is encouraged to raise concerns about actual and possible violations of this Policy to his/her line manager, the General Counsel ([Eriks.Struempel@coor.com](mailto:Eriks.Struempel@coor.com)) one of the company's Legal Counsels, or via the whistleblower portal at <https://report.whistleb.com/sv/coor>. Reports may be made anonymously. All reports will be investigated.

Coor does not accept any discrimination or other negative consequences for people that have reported suspected breaches in good faith, and neither for refusing to pay or accept bribes or engage in corrupt practices, even if such refusal may result in Coor losing business. Breaches of this Policy may result in legal actions including termination of employment or dismissal.



## 6. CHANGE LOG

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### *The latest changes in the document:*

UPDATE	SECTION	DESCRIPTION
2021-07-09	All document	First implementation of policy.