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# GIFTS AND ENTERTAINMENT POLICY 2021

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2020-12-15

## 1. Introduction

Sweco's business model is straightforward, efficient and customer oriented. It should be easy for customers to do business with Sweco. Interaction with customers and other third parties is extensive and a normal course of our business. Each employee has far-reaching responsibility for both Sweco's business as well as the project through which he or she serves the customer. Sweco expects the highest standards of integrity and conduct from its employees in all matters affecting Sweco.

Sweco Group Gifts and Entertainment policy apply throughout Sweco Group to all employees, temporary employees, agents, consortium partners, sub-consultants and the members of our Board of Directors engaged in any respect of work for Sweco. For ease of reference, the term "employees" will be used to refer to employees, temporary employees, agents, consortium partners, sub-consultants and the members of our Board of Directors.

This document outlines in more detail what is stated in the business ethics section of the Sweco Code of Conduct policy. Employees are expected to apply the principles of these policies as well as the Sweco Code of Conduct and [Sweco Anti-Bribery and Corruption policy](#) at all times.

A general principle for all decisions made by Sweco employees on the provisions or acceptance of gifts and entertainment must be able to withstand both internal and external scrutiny without damaging Sweco's reputation.

Abuse of these policies is therefore considered to be a very serious matter and any breach of the policies is potentially a disciplinary offence which could lead to a written warning or dismissal. When considering any disciplinary action, Sweco will assess to what extent an individual has followed both the rules and spirit of these policies.

These policies are not applicable for internal gifts and entertainment between Sweco employed personnel. For avoidance of doubt; sub-consultants, consortium partners, local representatives /agents and other third parties are in this sense not considered Sweco employed personnel.

## 2. General principles

Employees should be aware that this is an area where perception is almost always more important than fact.

All business decisions made on behalf of Sweco must be based on sound ethical judgement, in the best interest of Sweco and free from any undue influence, preferential treatment or special benefit to any individual or any other type of behaviour that might represent a conflict of interest. The giving and receiving of gifts and entertainment can found and strengthen goodwill. However, some gifts and entertainment secure or appear to secure improper influence and might even be seen as bribes attracting criminal liability. The implication of such gifts can

without doubt be very serious both for Sweco, the individuals involved, and the company involved. For further guidance on Sweco's principles on Anti-Bribery and Corruption, please see [Sweco Anti-Bribery and Corruption policy](#).

Sweco employees shall not (whether directly or through an intermediary) offer, promise, make, request or accept gifts or entertainment where:

- the monetary value, frequency, duration or nature is such as to cast doubt on Sweco, the individual's integrity, independence, objectivity or judgment; or
- the gift or entertainment constitutes a bribe under [Sweco Anti- Bribery and Corruption Policy](#); or
- this would otherwise result in a breach of applicable laws.

## 2.1 What are gifts and entertainment?

Gifts and entertainment can be anything of value to the receiver. They may include meals, tickets to sporting, theatre or other cultural events, promotional items, discounts, loans, cash, favourable terms on any product or service, services, prizes, transportation, use of another company's vehicles/transport, use of vacation/holiday facilities, stocks or other securities, home improvements and gift certificates. Excluded are courtesies and gratuities of negligible value for instance promotional items, diaries, calendars or similar.

## 2.2 Why is there a concern about offering or accepting gifts and entertainment?

The giving and receiving of gifts or entertainment is an important part of many business relationships and can provide valuable opportunities for developing an understanding of a customer's, or prospective customer's business and gaining the insight necessary for an effective and successful working relationship.

However, offering or accepting gifts or entertainment should be avoided **where this casts doubt over the integrity, independence, objectivity or judgment** of Sweco or the customer, prospective customer or third party (for example, a government or government agency).

Gifts and entertainment can also constitute bribes or give the impression of a bribe and therefore be in contravention of [Sweco Anti- Bribery and Corruption Policy](#). In addition, there may be specific laws (for example, relating to Public Officials<sup>1</sup>) which make it illegal for them to give or receive gifts or entertainment.

Customers may also have specific policies of their own concerning the offering or accepting of gifts and entertainment.

## 2.3 What specific factors should I consider when determining whether the monetary value, frequency, duration or nature of gifts or entertainment is such as to cast doubt on me or Sweco's integrity?

While the factors will depend on the circumstances of each case, issues to consider may include whether the offer, promise, making, request or acceptance of gifts or entertainment (in isolation and taken together with other instances with the same customer) is:

- provided openly and transparently;
- reasonable and customary under the circumstances taking into account the culture of the customer's country, if different from that of the subsidiary of my operation.
- Sweco employees should exercise their own judgment on the issue of what is appropriate when entertaining customers, however excessive and extravagant dining with customers or prospective customers should be avoided;
- not motivated by a desire to influence the recipient's objectivity in making a business decision;
- not of a level, type or frequency that the Sweco employee would feel uncomfortable about being revealed to the public, for example in a newspaper;
- in the case of corporate discounts, not provided on terms and conditions that are more generous than those offered to and being taken up by employees of similar large corporations and otherwise moderate;
- in the form of cash payments or cash equivalents, e.g., checks, loans, stock, stock options (in general, such payments would on their face cast doubt on an individual or firm's integrity)
- in compliance with the recipient organisation's policies if these are more restrictive than this policy and any additional policies, procedures and guidelines in place at the relevant Sweco subsidiary
- in compliance with law, Sweco Code of Conduct, Local gifts and entertainment policy, Sweco Anti-bribery and Corruption policy and the FIDIC Code of Ethics.

## **2.4 What is permissible?**

Gifts and entertainment to employees/contractors in other companies/organisations and persons closely linked to them are allowed only if they are given transparently, moderately, ethically and are not affecting behaviour. The same applies to what types of gift and entertainment Sweco employees may accept. Hospitality or promotional expenditure, which is proportionate and reasonable given our business, are generally allowed.

Sponsorship, charitable and other donations might be allowed. However, care should be taken in relation to sponsoring, donations or other charitable giving to customer or Sweco sponsored charities in case these could be construed to be intended to unduly influence a customer contact. Sponsorship, charitable and other donations always require pre-approval in accordance with the authorisation and signatory plan.

## **2.5 What is not permissible?**

The following is not permissible to offer, promise, make, request or accept.

Sweco employees may not provide gifts or hospitality to any Public Official other than in compliance with Sweco Anti-Bribery and Corruption policy.

Prohibited payments include rebates, commissions and “kick-backs” to third parties or intermediaries where the recipient or payee is not clearly the provider of the service, as well as “consultancy fees” and other such payments where the value to the company making the payment cannot be legitimately demonstrated.

Any gift of cash or cash equivalent (including but not limited to cheques, money vouchers, loans, stocks or stock options) are not permissible.

Any entertainment that is indecent sexually oriented or which might damage Sweco’s reputation is not permissible.

## **2.6 Travel, Lodging and Related Expenses of Public Officials**

Travel, lodging and related expenses (such as meals while traveling) of Public Officials paid by Sweco are generally prohibited unless they can be motivated by specific circumstances serving a legitimate business purpose. Also, any such travels must be properly documented.

Before arranging or paying such expenses, the Sweco employee proposing the payment must obtain the approval of their Business Area President. Whenever possible, Sweco should pay providers (airlines, hotels, etc.) directly for any travel, lodging and related expenses. Any exception to this requirement must be approved in advance by the General Counsel, in which case Sweco may reimburse the public official for reasonable travel, lodging and related expenses only if the expenses are supported by original receipts or invoices (not copies).

Under no circumstances may cash be transferred to a Public Official on the understanding that the Public Official will arrange for their own travel, lodging and related expenses. Airline or other tickets that can be converted in whole or part into cash must not be given to a Public Official without the prior written approval of the General Counsel.

In addition to the limitations and requirements summarized above, all payments for the travel, lodging and related expenses of Public Officials must comply with the following rules:

- the payment may not be for a class of travel or lodging that is more expensive than would be permitted for an employee holding a comparable rank within Sweco;
- the payment may cover only a Public Official who is needed in view of the business purpose justifying the travel;
- no payment may be made for members of a Public Official’s family, friends or others; and
- no side trip or extra days may be added to the trip that are not directly related to the business purpose justifying the travel unless the side trip or extra days are at a Public Official’s own expense and result in no additional cost to Sweco.

Records must be kept of any travel, lodging or related expenses of a Public Official that have been paid for or reimbursed by Sweco.

Even when payment for the travel, lodging and related expenses incurred by a Public Official is lawful, a Public Official may be required to disclose any such payment on a public register.

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Questions regarding such disclosure requirements should be directed to the General Counsel before any payments are made.

### **3. Employee responsibility**

All managers are responsible for ensuring that they and their employees are familiar with and comply with the policies. Sweco will not consider a lack of understanding as a valid reason for inappropriate or incorrect behaviour.

Furthermore, all managers are responsible to ensure that those within the scope of the policies receive training appropriate to their activities and the associated risks.

All employees are obligated to familiarise themselves with the contents of the policies and to follow them at all times. Furthermore, Sweco employees interfacing with Business Partners are to instruct such Business Partners to apply these principles.

All our employees should report knowledge or suspicion of remuneration that may be in conflict with these policies or the spirit of these policies to his or her manager, manager's manager, Sweco's Group Compliance Officer, HR or Sweco's General Counsel<sup>1</sup>.

### **4. Compliance with these policies**

#### **4.1 Who shall decide on gifts and entertainment?**

The business decision of giving and receiving gifts and entertainment shall be in accordance with the authorisation and signatory plan for each Sweco subsidiary.

Any gifts, entertainment and other business courtesies provided directly or indirectly to a single Public Official or individual in the private sector, which is above the local spending limit shall be approved by the General Counsel or the relevant Business Area President.

Each Business Area is responsible for ensuring that all gifts, entertainment and other business courtesies must be properly documented to include the name of the recipient, the name of the recipient's organisation, and the nature and value of the gift, entertainment or other business courtesy that has been provided.

#### **4.2 Which policies should be followed if my Sweco subsidiary has its own gifts and entertainment policies?**

If a Sweco subsidiary has policies, guidelines, procedures and/or processes that set standards in excess of these group policies, they should be followed by their Sweco employees.

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<sup>1</sup> Or other function as stated in Group investigation procedure.

### **4.3 What do I do if I have questions or have information on suspected or actual breaches or need further guidance?**

As soon as practically possible, please contact your manager, manager's manager, Sweco Group Compliance Officer, HR or Sweco's General Counsel<sup>2</sup>.

Sweco encourages all its employees to primarily contact its manager or equivalent to raise concerns. As a second option, should the first option not be practically suitable, employees also have the possibility to report suspicion on an anonymous basis using Ethics Line for raising concerns by contacting phone number or web address valid for your country, see information on Sweco intranet.

If any case of Misconduct is identified, an investigation will take place in accordance with what is set forth in this policy.

Sweco may at any time conduct independent reviews of compliance with these policies.

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<sup>i</sup> The term "Public Official" includes elected or appointed officials at all levels of government; employees or officers of a national, regional or local government; employees or officers of a government owned or controlled entity; employees or officers of public international organisations (e.g., the World Bank and other international financial institutions); or political parties, political party officials and candidates for public office. The term "Public Official" shall also include any other person who is carrying out activities on behalf of a government, government-owned entity, public international organisation, political party, or Public Official.

Stockholm, December 15, 2020  
Sweco AB

Åsa Bergman  
President and CEO

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<sup>2</sup> Or other function as stated in Group investigation procedure.