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# SPONSORSHIP POLICY 2021

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2020-12-15

## 1. Introduction

Sweco receives many requests to sponsor various activities such as local sports clubs, charitable organisations and events. Sweco is restrictive and selective in its consideration of sponsorships because the business value is usually limited while there are ethical risks to be considered.

This policy provides clarity in what and how Sweco sponsors. It should make it easier for Sweco's employees to manage sponsorship requests in a way that strengthen customer relationships while avoiding ethical dilemmas and ineffective use of Sweco's resources. All sponsorship activity must comply with this sponsorship policy.

The policy specifies: activities that are classified as sponsorship, the connection between sponsorship and Sweco's brand and business ethics, what and how Sweco shall sponsor, and who it is that makes sponsorship decisions. The policy applies to all employees, temporary employees, and directors of the Sweco Group (including all affiliates and business units in all jurisdictions). The policy covers all sponsorship issues, irrespective of amount or activity involved. For the sake of simplicity, the term "employee" as used in this document refers to employees, temporary employees and directors.

The starting point for the policy is that Sweco generally refrains from offering sponsorships. Where sponsorships are considered, it is a fundamental rule that any sponsorship Sweco does offer, whether internal or external, must be reviewed and approved by the relevant Business Area's President or Communication Manager. In agreement with Sweco's President & CEO and Group Compliance Officer they decide what Sweco can sponsor irrespective of amount or activity involved. Non-compliance with this policy may result in disciplinary measures, including but not limited to a written warning or dismissal.

## 2. General principles – what sponsorship means to Sweco

The term "sponsorship" refers to any situation where Sweco, or anyone acting on its behalf (such as a contractor), provides contributions, through the provision of goods or services, to a third party at no cost or a discounted cost, or where Sweco makes charitable donations to third party organisations.

In a sponsorship, Sweco plays an active role by providing funds, financial support or services, and in return it receives the benefit of having its corporate name associated with an important industry, charitable or community-related initiative. Classification as "sponsorship" requires mutual counter-performance or other consideration between the parties. If no such requirement is imposed, the activity is classified as a gift or donation. Gifts are regulated by Sweco's Gifts and Entertainment policy. The Sweco President & CEO and Group Compliance Officer makes decisions on donations.

It can sometimes be difficult to determine whether an activity is properly classified as a sponsorship. If you are uncertain as to whether a particular activity qualifies as a sponsorship, you should contact the Business Area's Communication Manager for clarification.

### **3. The connection between sponsorship and Sweco's business ethics**

To prevent the risk of corruption, Sweco employees shall act in accordance with the following: Sponsorships may not under any circumstances be provided (i) to influence a pending decision; (ii) as part of a personal benefit to an individual or individuals associated with the recipient organisation; (iii) without complying with the approval and documentation requirements of this policy; (iv) as part of a transaction involving the exchange of services within or outside the scope of an project; or (v) to in any other way influence someone improperly.

All activities sponsored by Sweco shall be aligned with the company's business ethics policies, which set high standards and require Sweco employees, and contractors acting on Sweco's behalf, to always act ethically and in Sweco's best interests. Accordingly, sponsorships may not be connected to fraud, secret agreements, conflicts of interest, or bribes and may not be coercive or result in collusion or other unlawful competition. Further information concerning Sweco's business ethics commitments can be found in the following policies, all of which must be complied with in full in connection with any sponsorship activities: the Sweco Code of conduct; Gifts and Entertainment policy; and Anti-bribery and Corruption policy. All of these are available on Sweco's intranet.

### **4. What Sweco can sponsor**

Sweco sponsorship shall promote the following values:

- Clearly support Sweco's business on a long-term basis by strengthening Sweco's brand and market position and demonstrating Sweco's recognised expertise
- Provide long-term value to the beneficiaries of the sponsorship
- Be aligned with Sweco's business ethics and values
- Be aligned with Sweco's communications policy and brand guidelines

### **5. Activities Sweco does not sponsor**

Sweco does not sponsor activities that lack any clear connection to Sweco's business or that raise potential risks under Sweco's ethics policies. Examples of prohibited sponsorships include the following:

- sponsorships for organisations that are not relevant to Sweco's business, such as sports, hobby or recreational associations;
- any sponsorship intended to benefit a specific private individual or individuals - all Sweco sponsorship activities must focus on ethical activity intended to achieve (1) a social community benefit and (2) the building of Sweco's relationship with current or potential institutional customers;

- activities with a political or religious connection, including any sponsorships for political organisations or any company that is majority-owned by, or otherwise acting on behalf of, a government official or political organisation of any country; and
- any other activities that are incompatible with Sweco's values and business ethics.

## **6. How Sweco shall sponsor**

The following mandatory procedures shall be followed in all Sweco sponsorship activities:

- A written contract must be prepared and executed that clearly specifies the rights and duties of Sweco and the counterparty under the agreement. The terms of the agreement may not place Sweco in a position that gives the counterparty "exclusive right" to Sweco in any way.
- Due diligence shall be conducted, and documented in writing, to ensure that the recipient of the sponsorship is a legitimate organisation conducting its affairs lawfully, and that is not connected, directly or indirectly, to government officials or political organisations.

Before the sponsorship agreement can be executed, the written approval for the agreement must be obtained by the relevant Business Area President or Communications Manager, and Sweco's President & CEO and Group Compliance Office.

- All sponsorships shall be treated as projects, and subject to the same procedures as other projects under Sweco@Work policies. A specific individual in the Business Area responsible for the sponsorship shall be designated as the project manager for the sponsorship, reporting to the Business Area President and, upon request, to Sweco Legal Department.
- Copies of all sponsorship agreements, documentation demonstrating the performance of obligations under those agreements, and any approvals secured under this policy, shall be maintained by the Business Area President in a central, readily accessible file.
- If sponsorship includes financial compensation, such compensation shall always be paid directly to the organisation or association that is being sponsored. This is to ensure that payments are made properly and that no intermediaries are involved.
- All sponsorships shall also comply with Sweco's Code of Conduct.

Other appropriate marketing activities that may be undertaken in connection with the sponsorship shall always be taken into account.

## **7. Employee responsibility**

All managers are responsible for ensuring that they and their employees are aware of and comply with these policies.

All employees are responsible for familiarizing themselves with the guidelines and following them at all times.

All Sweco employees shall report to their supervisor, their supervisor's manager, or directly to Sweco's Communications Department and Legal Department any and all instances of which they are aware or suspect that sponsorship-related activities have occurred, or are contemplated, that violated this policy or other Sweco policies.

### 7. Responsibility for sponsorship decisions

Sponsorship inquiries should be directed, in the first instance, to the Communication Manager or the Business Area President for the relevant business area. In agreement with Sweco's President & CEO and Group Compliance Officer they decide what Sweco can sponsor irrespective of amount or activity involved. Approval by a lower-level manager is not sufficient, even in cases where the manager is authorised to approve other types of contracts or agreements for the sponsorship amount involved.

### Appendix – Frequently Asked Questions

1. Why have Sweco's Sponsorship policy been updated?

Sweco's Sponsorship policy have been updated to clarify how the sponsorship process works and make things easier for Sweco employees when they receive sponsorship inquiries. The policy ensures that sponsorship procedures are uniform throughout the group. All sponsorship inquiries submitted to Sweco will be handled in the same way and be subject to the same procedure.

2. Why doesn't Sweco approve all sponsorship requests?

Sweco is a profit-making enterprise focused on delivering growth and profitability to enable the continued development of the company and our employees and create satisfied customers and shareholders. This is how Sweco wishes to contribute to societal well-being as an attractive employer and a taxpayer. Sponsorships may, on occasion, further those goals but sponsorships are not a core component of Sweco's business model.

3. What should I do if I receive a request for Sweco to sponsor something?

Sweco's sponsorship of an activity must be in line with Sweco's Sponsorship policy. If you think the request you've received meets this criterion, pass it on to the Communication Manager or Business Area President of your business area. If Sweco decides to sponsor the activity, you or other members of your team will be responsible for preparing a sponsorship agreement. The Communication Manager will provide a sponsorship agreement template if the sponsorship request is approved.

4. My customer wants Sweco to sponsor an activity. I'm concerned that our customer relationship will be negatively affected if we say no. How should I handle the situation?

Sponsorships linked to customer relationships can be tricky from a business ethics perspective and sponsoring this type of activity may be perceived as an inappropriate promotion of Sweco's business, which is impermissible according to Sweco's guidelines. In such a situation, explain to the customer that you are not

authorised to make this type of decision and that you follow Sweco's policies. If needed, seek further guidance from your manager or Sweco's Legal Department.

5. Can Sweco sponsor employees with products that carry the Sweco logo for sporting events, or by paying employees' entry fees to such events?

Sweco does not sponsor employee participation in sporting events. Sweco only sponsors such activities if there is a clear connection to Sweco's business or if Sweco is involved in the activity in some other way through its expertise or services. Sponsoring employees by providing products for such activities is a personnel issue and is decided by the HR department, but it may not in any way be connected to the development of customer business.

6. What should I do if I have questions or need further guidance?

You should contact your manager, his or her manager, the Communication Manager of your business area, the HR department or Sweco's Legal Department. Your first point of contact should be your immediate manager. As another alternative, you can use the Ethics Line to discuss your concerns – phone numbers for the Ethics Line are available on Sweco's website.

7. What happens in the event action is identified that violates the policies?

An investigation will be conducted under the leadership of Sweco's Legal Department, Communication, HR and Corporate Finance departments.

8. Why can't I approve sponsorships when they are funded by my own budget and within the money-amount I am authorised to approve?

In order to ensure all sponsorship inquiries submitted to Sweco will be handled in the same way and be subject to the same procedure.

Stockholm, December 15, 2020  
Sweco AB

Åsa Bergman  
President and CEO