
SPONSORSHIP POLICY 2023

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DATE OF APPROVAL: 2022-12-14
APPROVED BY: PRESIDENT & CEO

SWECO AB

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1. Introduction and purpose

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.

2. Scope

The policy applies to all employees, temporary employees, and directors sub-consultants, consortium partners and agents/representatives throughout Sweco (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 policy refers to employees, temporary employees and directors.

3. Definitions and abbreviations

N/A	N/A
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4. List of references

- Sweco Code of Conduct policy
- Sweco Anti-bribery and corruption policy
- Sweco Gifts, Hospitality and Entertainment policy
- Decision making procedure and authorisation policy

5. General principles

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 General Counsel or 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.

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, Hospitality and Entertainment policy. The Sweco General Counsel or Group Ethics 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, the Business Area's Communication Manager should be contacted for clarification.

5.1 The connection between sponsorship and Sweco's business ethics

To prevent the risk of corruption sponsorships may not under any circumstances be provided:

- to influence a pending decision;
- as part of a personal benefit to an individual or individuals associated with the recipient organisation;
- without complying with the approval and documentation requirements of this policy;
- as part of a transaction involving the exchange of services within or outside the scope of a project; or
- 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 Business Partners (sub-consultants, consortium partners and agents/representatives) 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 policy; Gifts, Hospitality and Entertainment policy; and Anti-bribery and Corruption policy. All of these are available on Sweco's intranet.

5.2 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; and
- be aligned with Sweco's Communications policy and brand guidelines.

5.3 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
 - a) a social community benefit; and
 - b) 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.

5.4 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 General Counsel or Group Ethics Compliance Officer.
- 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.

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

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 content of the policies and to always follow them.

All Sweco employees shall report all instances of which they are aware or suspect that sponsorship-related activities have occurred, or are contemplated, that may violate this policy or other Sweco policies. Report can be made to their manager, manager’s manager,

Sweco's Group Ethics Compliance Officer, Sweco's General Counsel or directly to Sweco's Communications Department¹.

7. Consequences of non-compliance

Non-compliance with a Sweco Group Policy may lead to disciplinary actions, up and to including dismissal.

Abuse of these policies is a serious matter and any breach against these policies is potentially a disciplinary offence which could lead to, for example, 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.

8. Implementation and awareness

Distribution in accordance with Sweco's general distribution plan for policies. Business Areas are responsible for providing training to its employees as needed.

9. List of appendices

9.1 Appendix 1 – Frequently Asked Questions

Document change log

DATE	VERSION	COMMENT ON MATERIAL CHANGES
2021-12-15	1.0	TRANSFERRED INTO NEW TEMPLATE INCLUDING ANNUAL UPDATE
2022-12-14	1.1	ANNUAL REVIEW

¹ Or other function as stated in Group internal reporting procedure.