



SWECO GIFTS, HOSPITALITY AND ENTERTAINMENT POLICY 2026

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APPROVED BY: PRESIDENT & CEO

SWECO AB

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1. Introduction and purpose

Sweco's business model is straightforward, efficient and client oriented. It should be easy for clients to do business with Sweco. Interaction with clients 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 projects through which they serve the client. Sweco expects the highest standards of integrity and conduct from its employees in all matters affecting Sweco.

This document outlines in more detail what is stated in the business ethics section of the Sweco Code of Conduct. Employees are required to always apply the principles of these policies as well as the Sweco Code of Conduct and Sweco Business Ethics policy.

Other language versions of the Policy than English shall be considered as translations only and in case of conflict with the translated version, the English version shall prevail.

2. Scope

Sweco Group Gifts, Hospitality and Entertainment policy applies throughout Sweco to all employees, temporary employees, Business Partners (as defined in the Sweco Business Ethics policy) 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, Business Partners and the members of our Board of Directors.

This Policy is not applicable for Sweco internal gifts and entertainment between Sweco employed personnel. For avoidance of doubt, Business Partners and other third parties are in this sense not considered Sweco employed personnel.

3. Definitions and abbreviations

Not applicable.

4. List of references

- Sweco Code of Conduct
- Sweco Business Ethics policy
- Sponsorship and charitable donation policy
- Decision making procedure and authorisation policy

5. General principles

As a general principle, all decisions made by Sweco employees on the provision or acceptance of gifts and entertainment must be able to withstand both internal and external scrutiny without damaging Sweco's reputation

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 bribes attracting criminal liability. The implication of such gifts can without doubt be very serious both for Sweco, the individuals involved, and the other company involved. For further guidance on Sweco's principles on Anti-Bribery and Corruption, please see Sweco Business Ethics policy.

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

- the monetary value, frequency, duration, or nature is such that it may cast doubt on Sweco, the individual's integrity, independence, objectivity, or judgment;
- the gift, hospitality or entertainment constitutes a bribe under Sweco Business Ethics Policy; or
- this would otherwise result in a breach of applicable laws.

5.1 What are gifts, hospitality, and entertainment?

Gifts, hospitality, and entertainment can be anything of value to the receiver, e.g. 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 or similar.

5.2 Why is there a concern about offering or accepting gifts, hospitality, and entertainment?

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

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

Gifts, hospitality, and entertainment can also constitute bribes or give the impression of a bribe and therefore be in contravention of Sweco's Code of Conduct and Sweco Business Ethics Policy. In addition, there may be specific laws (for example relating to Public Officials¹) which make it illegal for them to offer, give or receive gifts, hospitality, or entertainment.

Clients may also have specific policies of their own concerning the offering or accepting of gifts, hospitality, or entertainment.

5.3 What specific factors should I consider when determining whether the monetary value, frequency, duration or nature of gifts, hospitality or entertainment could 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, hospitality, or entertainment (in isolation and taken together with other instances with the same client) is:

- provided openly and transparently;
- reasonable and customary under the circumstances taking into account the culture of the client's country, if different from that of the subsidiary of my operation;
- 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 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; and
- in compliance with law, Sweco's Code of Conduct, a Local gifts and entertainment policy, Sweco's Business Ethics policy and the FIDIC Code of Ethics.

5.4 What is permissible?

Gifts, hospitality, 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 gifts, hospitality, and entertainment Sweco employees may accept. Hospitality or promotional expenditure, which is proportionate and reasonable given our business, are generally allowed.

¹ 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.

Sweco employees should exercise their own judgment on the issue of what is appropriate when entertaining clients, however excessive and extravagant dining with clients or prospective clients must be avoided.

Sponsorship and charitable donations are not covered by this policy. See the [Sponsorship and charitable donation policy](#) for more guidance on sponsorship and charitable donations.

5.5 What is not permissible?

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

- gifts, hospitality, or entertainment to any Public Official other than in compliance with [Sweco Business Ethics policy](#),
- gifts of cash or cash equivalents (including but not limited to cheques, money vouchers, stocks, or stock options) and loans,
- entertainment that is indecent, sexually oriented or which might damage Sweco's reputation, and
- gifts, hospitality, or entertainment that affect behaviour.

5.6 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 expense 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 service providers (airlines, hotels, etc.) directly for any travel, lodging and related expenses. Any exception to this requirement must be approved in advance in writing 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 payment be made 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 or hotel reservations 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 summarised 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. Questions regarding such disclosure requirements should be directed to the General Counsel before any payments are made.

5.7 Who shall decide on gifts, hospitality, 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 Public Official or individual in the private sector, which is above the local spending limit require pre-approval 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 are 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.

5.8 Compliance with this Policy

5.8.1 Which policies should be followed if a Sweco subsidiary has its own gifts and entertainment policy?

When a Sweco subsidiary has policies, guidelines, procedures and/or processes that set standards in excess of this policy, they should be followed by the Sweco subsidiary's employees.

5.8.2 Where to go with questions or information on suspected or actual breaches or if there is a need for further guidance?

As soon as possible, Sweco employee should contact their manager, manager's manager, Local Compliance Officer, a legal counsel, Group Ethics Compliance Officer, HR, or General Counsel if guidance is needed.

Sweco encourages all its employees to primarily contact their manager or equivalent or any of the other above-mentioned people to raise concerns. As a second option, should the first option not be suitable, employees also have the possibility to report suspicion on an anonymous basis using Ethics Line.

If a report is submitted in good faith and there is sufficient information, suspected breach of this Policy will be investigated.

Sweco may at any time conduct independent reviews of compliance with this Policy.

6. Roles and Responsibilities

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

Furthermore, all managers are responsible for ensuring that those within the scope of this Policy have relevant knowledge and understanding appropriate to their activities and the associated risks.

All employees are obligated to familiarise themselves with the contents of this Policy and to always follow it. Furthermore, Sweco employees interfacing with Business Partners are to instruct such Business Partners to apply these principles.

All employees must report knowledge or suspicion of behaviour that may be in conflict with this Policy or the spirit of it to their manager, manager's manager, Local Compliance Officer, a legal counsel, Sweco's Group Ethics Compliance Officer, HR, or General Counsel. Sweco Ethics Line may also be used for such reporting.

7. Consequences of non-compliance

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

Abuse of this Policy is a serious matter, and any breach of this Policy 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 this Policy.

8. Implementation and awareness

Distribution in accordance with Sweco's general distribution plan for policies.

Training on the content of this Policy is part of the onboarding process for new employees and employees are to be continuously trained during the employment.

9. List of appendices

Not applicable.

Document change log

DATE	VERSION	COMMENT ON MATERIAL CHANGES
2021-12-15	1.0	Transferred into new template including annual update
2022-12-14	2.0	Anti-corruption wording moved to anti-bribery and corruption policy + Editorial changes
2023-12-13	2.1	Annual review + Editorial changes
2024-12-13	2.2	Annual review + Editorial changes
2025-12-11	2.3	Annual review + Editorial changes + clarification regarding sponsorship and donation