

## Gifts and Hospitality at Saab

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### **1 Validity**

The entire Saab Group.

### **2 Purpose**

Gifts and hospitality (G&H) may be an acceptable and appropriate business practice to build goodwill in business relationships. However, improperly managed G&H may constitute bribery and corruption, which is strictly prohibited under Saab's anti-bribery and corruption policy and by law.

The purpose of this document is to guide the organisation to an appropriate standard in its management of G&H.

A gift means the offering, giving or receiving of anything of value that is not hospitality.

Hospitality means the offering, giving or receiving of any travel, food, drink, accommodation, entertainment, sporting or cultural event.

G&H can take many forms; it can be a standalone activity or an integrated element of a larger context, for ex. user conferences, trade exhibitions or other business events.

### **3 Requirements and guidance**

#### **3.1 General requirement for all G&H**

The offering, giving or receiving of G&H must:

- a) not influence, or appear to influence, the recipient to misuse its position or breach its duties towards its employer or principal
- b) comply with any applicable laws and regulations
- c) comply with any internal rules of the recipient's organization
- d) not be regularly extended to the same person
- e) be handled in an open and transparent manner
- f) be accurately and fairly recorded in Saab's books
- g) not be cash or cash equivalent (such as gift cards, vouchers or similar)
- h) not be, or give the impression of being excessive, lavish or unethical
- i) be approved according to section 4.

In assessing the general appropriateness of G&H the "Blush Test" may be helpful – you should not offer, give or receive G&H that you would feel embarrassed to disclose the details of to your colleagues, family or media.

### **3.2 Specific requirements for hospitality**

The offering, giving and receiving of hospitality must also comply with the following requirements:

- a) The hospitality must have, or be connected to, a relevant business content that is aligned with Saab's business objectives. The invitation of family members jeopardizes the connection to Saab's business.
- b) Saab representatives must participate in the hospitality.
- c) Invitations to major events or hospitality of a higher value such as rollouts, user conferences or anniversaries shall be directed to, or approved by, a superior level of the recipient's organisation.
- d) The hospitality must never include elements that are or could give the appearance of being unethical, offensive or inappropriate (such as adult entertainment).

### **3.3 Public officials**

Saab's business activities are largely oriented towards nation's armed forces, governments, governmental authorities or procurement organisations, state owned entities and their representatives (Public Officials). When dealing with Public Officials even small, bona fide, legitimate G&H may be misinterpreted as bribes. Special precaution is therefore needed in relation to Public Officials to avoid any suspicion that Saab is attempting to improperly influence a public decision or the use of public funds.

### **3.4 Ongoing negotiations**

Special precaution is called for in connection with business negotiations, regardless if the other party is a Public Official or if it is a business-to-business matter. If an individual holds a decision-making position in an on-going procurement process or is involved in the preparation or evaluation as part of such process, G&H which otherwise would be reasonable may become improper.

## **4 Approval levels and use of assessment tool**

Apart from basic refreshment with lower value, all G&H needs to be approved. Please note that the approval does not automatically make the G&H permissible, it still has to fulfil the requirements in section 3. Authorization to approve and relevant levels, see INF-0744 App 2.

As guidance in assessing the appropriateness of the G&H, you may use the G&H assessment tool, IN 5000363-058 “Gifts and Hospitality (“G&H”) Assessment Tool.

## **5 Saab employees as recipients of external G&H**

It is a requirement that Saab employees always are acting impartially in the management of their duties and avoid the risk or perception of being affected by any irrelevant or illegal considerations. The requirements regarding G&H set out herein apply also for Saab employees as recipients of G&H. It is important to note that these requirements serve as a protection of Saab employees against suspicion of improper conduct and even criminal misconduct.

If you receive G&H that is not consistent with this instruction, you must reject the G&H. If the cultural circumstances are such that it would be perceived as disrespectful to reject the G&H, you may accept it on behalf of the company and then promptly report it to your manager and, in case of a gift, hand it over to the gift repository managed by Ethics and Compliance centrally or in your office or jurisdiction.

## **6 Local adaptations**

Saab may in some countries need to put in place additional supplementing local rules and processes for G&H. Any such rules or processes must be approved by Ethics and Compliance.

## **7 Further information**

You are welcome to contact Ethics and Compliance at [email address].