

Saab's anti-bribery and corruption training programme

1 Validity

The entire Saab Group.

2 Purpose

Saab adheres to a policy of zero tolerance of bribery and corruption.

This instruction shall ensure that anti-bribery and corruption (ABC) training of Saab employees is conducted to meet Saab's exposure to corruption risks and that any division of responsibilities is clear. The training and responsibilities are summarized in INF-2008 App 1.

Training of Saab's intermediaries and Ethics and Compliance Officers are handled in separate documents.

3 Saab's exposure to corruption risks

3.1 Corruption risk assessment

Saab conducts the major part of its business:

- within the defence sector,
- on the international stage,
- towards state customers,
- with the support of third parties; and
- in countries with low CPI (Transparency International's Corruption Perception Index).

Each one of the above circumstances drives corruption risks and they are not limited to certain entities or functions within Saab Group. Therefore, all employees and directors need at least a basic level of awareness of Saab's ABC program (Basic ABC-training).

Functions that are responsible for marketing and sales, procurement or work in close connection to these groups in terms of management, support or financial control have a higher exposure to corruptions risks (Functions at Risk). Consequently, these groups need additional training in ABC.

Parts of the Functions at Risk are directly in contact with customers, intermediaries and suppliers on a frequent basis or has a decisive winning business mandate and are therefore at the forefront of corruption risks. These groups need in-depth training in ABC relative their task (Targeted Groups).

3.2 Identification of training recipients

Training that shall reach all employees is easily distributed through Saab's learning management system (LMS). Any separate cells in LMS that has to be handled locally or organisations not included in the LMS shall be the responsibility of the relevant organisation, Business Area (BA) or Operational Country (OpC), i.e. local distribution.

Group E&C is responsible to make an annual generic assessment of Functions at Risk. The result of such assessment shall be communicated with Compliance officer in BA and OpC for completion with the result of a deeper risk assessment within their organisation. The information from BA and OpC to Group E&C shall be in a format directly transferable to the LMS.

The Targeted Groups shall be defined by the responsible trainer organisation, see Section 4.3.

4 Training courses and responsibilities

4.1 Basic ABC-training

The basic ABC training concerns all employees and shall cover awareness of anti-corruption, speak-up and Saab's E&C functions. The basic ABC training shall be conducted through e-learning, be repeated at least every three years and be part of the mandatory training for new employees.

Group E&C is responsible to develop and distribute the basic ABC training.

4.2 Training for Functions at Risk

The Functions at Risk are exposed to a higher corruption risk and are widely spread in the organization and on all continents. To secure that all individuals receive training, e-learnings shall be distributed to these functions. Considering the risk level, they shall receive annual ABC training with varying content for each year.

Group E&C is responsible to develop and distribute annual ABC e-learning to Functions at Risk.

4.3 Training for Targeted Groups

Targeted Groups need a deeper understanding of the risks, red flags and responsibilities. To be able to adjust the training to their task and experiences this training shall be conducted as classroom training, face-to-face or live webinar, to include questions, answers and discussions. The assessed risks exposure together with the outcome of the training sessions shall determine the frequency of the training.

Group E&C shall be responsible to identify the Targeted Groups within Group Functions, define their needs for ABC-training (beyond any training received according to Section 4.1 and 4.2) and conduct such training. Group Management shall be trained by Group E&C on an equal basis. BA and OpC shall have equal responsibility within their organization. Group E&C is responsible to develop and update templates for scenario sessions to be used for Targeted Groups, as applicable.

Group E&C, BA and OpC shall plan their training of Targeted Groups and consult each other to find synergies in conducting the training sessions, i.e. training material, travel and resources.

Board of Directors may not directly be in contact with customer, suppliers or intermediaries but need an updated understanding of Saab Group's corruption risks and ABC-program. Group E&C shall define the need of training and conduct classroom training with the Board of Directors of Saab AB at least every three years. The BA and OpC shall secure that the Board of Directors of all companies within their organisation receive equivalent training, if the directors have not received relevant training separately.

5 Reporting

The training sessions, the invited employees and their completion shall be registered in the LMS for traceability.

Group E&C shall report the consolidated completion of all ABC training within the Saab Group to Ethics and Compliance Board.

BA and OpC shall report the level of completion of all ABC training per BA/OpC to its respective management and shall support any other need of internal or external reporting.

6 Training Plan

Group E&C shall monitor the overall need for ABC training. The task includes a training plan for three years (Group E&C Training Plan), which shall settle the content of the Basic ABC-training and training of Functions at Risk together with topics to be covered by training for Targeted Groups (e.g. gifts and hospitality, conflict of interest, third party management etc.). The plan shall consider lessons learned from audits and investigations and shall be developed in consultation with the Compliance Officers at BA and OpC.

7 Appendices

INF-2008 Training Programme
App 1