

Gifts and Hospitality at Saab

Table of Contents		Page
1	Validity	1
2	Purpose, applicability and definitions	1
3	How to use this Instruction	2
4	Prohibited G&H	2
5	Assessing other G&H	3
6	Approval levels	4
7	How to act when receiving G&H	4
8	Local adaptations	4
9	Appendices	4

1 Validity

The entire Saab Group.

2 Purpose, applicability and definitions

The purpose of this Instruction is to provide guidance on the promising, offering and receiving of gifts and hospitality (“G&H”) to ensure compliance with Saab’s zero-tolerance for corruption.

- A gift is any item of economic or personal value, including corporate merchandise and giveaways.
- Hospitality is services, events or entertainment such as:
 - lunches, drinks or dinners;
 - sporting events, theatre, concerts or other leisure activities; and
 - travel and accommodation.

Note 1: This Instruction does not apply to internal representation.

Note 2: If you are arranging a visit for public officials from an existing or potential customer, lasting for two days or more, detailed guidance is found in INF-0744 App 3.

- A *public official* is any individual who holds a position in, acts on behalf of, or is employed by a government or military authority or agency (national or foreign), including state-owned enterprises and international organisations (such as NATO or the EU). This includes, for example, military officers, politicians (national, regional, or local), ambassadors, representatives of regulatory authorities, and other public servants.

3 How to use this Instruction

When you consider offering or receiving G&H, take the following actions:

- a) make sure the G&H is not prohibited according to section 4
- b) determine if you think the G&H is appropriate according to section 5
- c) seek approval according to section 6
- d) make sure the G&H is accurately noted in Saab's books and records.

4 Prohibited G&H

G&H may constitute a bribe if offered or promised to influence the actions of someone, to get an unfair advantage. It's also enough that G&H, from an outsider's perspective, can be perceived that way.

G&H can also expose Saab to unacceptable reputational risk.

Therefore, the following types of G&H are never acceptable:

- a) cash, gift cards or other payment means
- b) private discounts, rebates or side deliveries
- c) holiday accommodation or travels
- d) activities that can be perceived as unethical by their nature
- e) inclusion of family members, unless specifically approved by the CEO, the General Counsel or the Head of Group Ethics and Compliance.

5 Assessing other G&H

All other G&H must be objectively assessed to determine if it is appropriate or not. The following questions must be considered when making this assessment. If you conclude that the G&H is or could be perceived as inappropriate, you shall not proceed.

<i>Who is the recipient</i>	Can the recipient's position or your relationship with the recipient create the appearance of corruption or a conflict of interest? In addition to being cautious with public officials, who must always act in the public's best interest, we must be particularly careful with recipients who can influence contract negotiations or decisions relevant to Saab's operations, or who perform monitoring or reporting duties. Examples include contract negotiators, auditors, and journalists.
<i>What is the nature and value of the G&H?</i>	The G&H must be of modest value and appropriate nature for the relationship and the occasion. Expensive gifts, luxurious dinners and other activities that can be perceived as excessive, extravagant or unethical by nature shall be avoided.
<i>Is there a business relevance?</i>	The weaker the connection between G&H and a professional activity, the higher the risk that G&H will be deemed inappropriate. The professional aspect of an event should always outweigh the personal or entertaining elements. Saab representatives shall participate in all hospitality offered by Saab.
<i>How often do we offer G&H?</i>	Repeatedly offering G&H to the same individual can make otherwise acceptable G&H inappropriate. For example, taking customer representatives out for dinner on one occasion may be acceptable, but recurring dinners with the same individuals could impact the assessment. Over time, the cumulative value increases, and the relationship might appear more private than professional.
<i>When do we offer the G&H?</i>	Certain situations increase the risk of G&H being perceived as a bribe, such as during contract negotiations, acceptance tests, the final stages of procurement, or when applying for regulatory permits. In situations where Saab is dependent on the approval or acceptance of the recipient, G&H offered by Saab shall be kept to a minimum or avoided altogether.
<i>Is the G&H transparent?</i>	G&H must be handled in an open and transparent manner, both internally and externally. G&H shall be communicated and approved internally, and the costs, nature and participants during a hospitality activity shall be correctly documented in Saab's books and records.
<i>Does it comply with internal rules?</i>	In addition to complying with applicable laws, G&H must adhere to the internal rules of the recipient's organisation, as well as any relevant contractual obligations. It is not uncommon for commercial agreements to include anti-corruption provisions that address G&H. If we are unaware of such restrictions, we shall seek to inform ourselves before offering the G&H.

6 Approval levels

All G&H needs to be approved or reported according to INF-0744 App 2.

7 How to act when receiving G&H

Sometimes, Saab employees may be offered G&H. This is the case for instance when suppliers invite us to lunch or dinner, when we receive seasonal gifts from business partners or when we are invited to participate in conferences.

G&H that is offered to Saab employees as recipients shall be assessed against the same principles as G&H offered by Saab and approved or reported in accordance with INF-0744 App 2. G&H that does not meet the requirements of this Instruction shall not be accepted.

You may never use your position in Saab to obtain G&H for yourself or on behalf of Saab. Solicitating G&H is prohibited, such as asking for gifts or dinners.

In case cultural or other circumstances are such that it would be considered disrespectful to reject the G&H, you may accept the G&H but must report it in accordance with INF-0744 App 2. Any such gift shall be handed over to the gift repository managed by Group Ethics and Compliance or in your office or jurisdiction.

8 Local adaptations

In some countries there may be a need to have supplementing local rules and processes for G&H. Any such local adaptations must be approved by Group Ethics & Compliance.

9 Appendices

INF-0744 Approval of Gifts and Hospitality
App 2

INF-0744 Customer Visit Guideline
App 3