

## Management and Prevention of Bribery and Corruption Risks

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#### **1**      **Validity**

The entire Saab Group.

#### **2**      **Purpose**

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

The purpose of this document is to lay down the rules and procedures to be applied at Saab in order to prevent bribery and corruption in all activities under Saab's control. It is the responsibility of all Saab organisations to ensure that their operations are always conducted in full compliance with this document.

Non-compliance with the requirements herein will result in disciplinary actions up to and including termination of employment.

### 3 Anti-bribery and Anti-Corruption

**Bribery** is the offering, providing, authorising, requesting, or receiving of a financial or other advantage for the purpose of encouraging or inducing the recipient or any other person to act improperly or to secure an improper advantage.

A bribe can take many forms, for example:

- money or financial instruments
- unreasonable gifts, entertainment or hospitality
- unwarranted rebates or discounts
- excessive commissions or fees
- kickbacks
- improper sponsorships
- improper political or charitable contributions
- anything else of value.

A financial or other advantage need not necessarily be of large value to constitute a bribe. Anything that is given with the intent of getting something in return is a bribe. Already the offer or promise of a bribe constitutes bribery. It is not necessary that the bribe is actually given or received.

**Corruption** has the same attributes as bribery and can be summarized as the misuse of entrusted power, whether in public or private sector, for private gain.

Neither Saab nor anyone acting on Saab's behalf may engage in corruption or provide, authorise, request or receive a bribe either directly or indirectly, including through any third party. This includes the prohibition of facilitation payments, i.e. payments to a public or governmental official to expedite or speed up a routine procedure or service to which the payer is already entitled.

Reference  
WHY-0024 Anti-Bribery and Corruption Policy

### 4 Gifts and hospitality (G&H)

G&H is a widely accepted aspect of building goodwill and good business relationships with existing and potential business partners. However, improperly managed G&H may constitute or be perceived as bribery. To ensure that G&H is not misused or misinterpreted for bribery, the offering or receiving of G&H shall always follow the rules and procedures laid down in Saab's instruction for G&H.

Reference  
INF-0744 Gifts and Hospitality at Saab

## 5 Business partners

Saab can be held liable for the acts of business partners that perform services for or on behalf of Saab. Accordingly, due care must be exercised in relation to all business partners to ensure that any associated corruption or reputational risks are identified, assessed and properly dealt with.

All business partners shall be subject to corruption risk management processes. The categorization of business partners, in decreasing order of risk, and the applicable process for each category is set out below.

Category 1	Category 2	Category 3	Category 4
Business Intermediaries (market consultants, lobbyists, offset consultants, strategic advisers and resellers)	Prime Contractors Offset Suppliers Local Industrial Partners Teaming Partners	Joint Venture Partners	All other
Corruption risk management in accordance with INF-0742	Corruption risk management in accordance with INF-0743	Corruption risk management in accordance with the M&A process	Corruption risk management in accordance with ordinary operations

For more information and guidance about which business partners that belong in each category, please refer to Saab's Business Partner Categorization Table GMS-0518 or contact Ethics and Compliance (E&C).

If a business partner falls into more than one category then it should be managed in accordance with the corruption risk management process for the category which is considered the highest risk.

If you are in doubt about the categorization of a business partner or the applicable corruption risk management process you are instructed to contact E&C.

### References

INF-0742	Corruption risk management of Category 1 Business Partners (Business Intermediaries)
INF-0743	Corruption risk management of Category 2 Business Partners
GMS-0518	Saab's Business Partner Categorization Table

## **6 Sponsoring and social engagements**

Sponsoring and donations must never be used with the intent to secure an improper business advantage. Where sponsoring initiatives involves hospitality packages, their content and use must be consistent with Saab's internal rules for G&H. Sponsoring activities and donations must always be aligned with Saab's Sponsorship Policy and follow the rules and procedures laid down in Saab's guidelines for sponsorships and donations.

### References

WHY-0027	Sponsorship and donation Policy
INF-0703	Guidelines sponsorships and donations

## **7 Conflicts of interest**

A conflict of interest occurs when personal or financial interests interfere, or may appear to interfere, with Saab's best interests. It is not possible to list exhaustively all situations in which a conflict may arise. However, the basic factor in all conflicts of interest is the division of loyalty between Saab's interests and personal interests. Employee hiring, procurement and outside jobs are examples of activities that may give rise to conflicts of interest.

Saab employees are expected to act at all times in the best interest of Saab and never let business dealings on behalf of Saab be influenced by personal considerations or relationships.

Anyone involved in a situation which may constitute a conflict of interest or which others could reasonably perceive as a conflict of interest, must report it to his or her superior, to HR or to Group Legal Affairs who will assess whether there is a conflict of interest and how to best address it.

## **8 Reporting**

All Saab employees have a duty to report suspected non-compliance with applicable laws or Saab's Code of Conduct. Reports can be made to a superior manager, to a compliance officer, to the general counsel, or through the Saab Whistleblowing Hotline. All reports will be followed-up and handled in accordance with Saab's Whistleblowing Investigation Instruction.

Reference  
INF-1699 Whistleblowing investigation instruction

## **9 Follow-up and control**

Internal Audit will in accordance with tasks given by the Saab board of directors pay particular attention to compliance with this document and the rules and procedures referenced herein.