

Anti-Corruption Policy

At SPM Instrument the way we do things is just as important as what we do. Of course, we want to be the best in our industry but not at any price. We want to create a workplace where each employee achieves the highest business and personal standards, and where everyone feels proud of our company and the job which he or she does.

SPM is a team with core values: Accountable, Customer Focused and Team Driven. These values guide how we work every day. We bring these values to life in the way we perform, giving our best effort every day, being accountable for what we do, delivering on our commitments to each other and to our customers, setting objectives, meeting our goals, and working together to achieve business results. A core objective of our Company is creating a winning and inclusive culture that drives results.

By working as an employee at SPM, you are representing the Company to our customers and everyone else you come into contact with. As laid out in our Code of Conduct 71939 B (CoC) you are expected to adopt the highest standards of professional and personal behavior and demonstrate Respect, Integrity, Good judgement, Honesty and Trust, the RIGHT Way, in all your actions, no matter what the circumstances.

One of the guiding principles of the CoC is 'complying with anti-corruptions laws'. The Anti-Corruption Policy extends on this principle, and is applicable to all employees and everyone we do business with, including agents, representatives, consultants, independent contractors and anyone acting on behalf of SPM.

If you have any questions regarding SPM's Anti-corruption Policy, please contact your local SPM representative.

Purpose of the Anti-Corruption Policy

This policy outlines acceptable and non-acceptable behaviors to ensure compliance with international anti-corruption laws. Includes compliance with all laws, domestic and foreign, prohibiting improper payments, gifts or inducements of any kind to and received from any person, including officials in the private or public sector, customers and suppliers.

Helpful Definitions

Bribe: Anything of value given in an attempt to affect a person's actions or decisions in order or to gain or retain a business advantage. Anything of value includes cash, entertainment or other gifts or courtesies.

Corruption: The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

Facilitation payments: Small sums paid to government officials to facilitate or expedite routing. Non-discretionary government actions are considered facilitation payment.

Kickbacks: The return of a sum already paid or due as a reward for awarding of furthering business.

What Does 'Anti-Corruption' Mean to You?

Corruption can take place in many types of activities. It usually is designed to obtain financial benefits or other personal gain. For example, bribes are intended to influence behavior – they could be in the form of money, a privilege, an object of value, an advantage, or merely a promise to influence a person in an official or public capacity. Usually, two people are involved and both will benefit. Examples of a bribe include:

- Offer or receipt of cash in the form of a kickback, loan, fee or reward
- Giving of aid, donations or voting designed to exert improper influence

The areas of business where corruption, including bribery, can most often occur include:

1. Gifts, Entertainment and Hospitality
2. Facilitation Payments
3. Procurement Process
4. Political, Community and Charitable Contributions

Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality are acceptable if they are reasonable, proportionate and made in good faith and in compliance with our company policies. These activities must be in compliance with our Code of Conduct (guiding principle: 'avoiding conflicts of interest'), Examples of gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, invitations to events, functions, or other social gatherings, in connection with matters related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

How do you know if an offered gift, entertainment or hospitality by SPM or to SPM is acceptable? First, take a step back and ask yourself the following:

- What is the intent – is it to build a relationship or is it something else?
- How would it look if these details were on the front of a newspaper?
- What if the situation were reversed – would there be a double standard?

If you find it difficult to provide a comfortable answer to one of the above questions, ASK your manager, local Legal Department or the Ethics and Compliance Office.

What to do when you doubt if you can accept? If you are unsure if you should accept something of value – ASK. Ask your manager. If your manager is participating, seek a higher-level manager.

As a general rule, SPM employees and business partners should not provide gifts or hospitality to, or receive them from, a government or other public official (or their close families and business associates). You may give a modest gift to these parties when appropriate and allowed by local law provided you discussed it with and received written approval in advance from the legal department. Please refer to our Code of Conduct, “Engaging in Government and Political Activities” which allows political contributions as permitted by law and only when approved in advance by our senior public affairs officer and legal counsel.

2. Facilitation Payments

Facilitation payments are not allowed. If you are unsure whether certain payments represent facilitation payments, please contact your local Manager.

Procurement Process

You must follow SPM processes and adhere to the system of internal controls around supplier selection. Supplier selection should never be based on receipt of a gift, hospitality or payment. When supplier selection is a formal, structured invitation for the supply of products or services (often called a ‘tender’), it is most important we maintain documentation supporting our internal controls.

Books, Records and Internal Control Requirements

Expenses must never be hidden or purposefully misclassified. Many serious global bribery and corruption scenarios are found to involve inaccurate record-keeping. To prevent this, international anti-corruption laws generally require detailed and accurate accounting records for transactions, including cash and bank accounts. We must ensure we maintain accurate books, records and financial reporting.

All business units must maintain an effective system of internal control and monitoring of our transactions. Certain monitoring controls are identified in our policies, specifically regarding approval of travel and entertainment expenses. It is your responsibility to be knowledgeable of control procedures and ensure compliance.

You Are Responsible

SPM takes corruption and bribery very seriously. Any violation of this policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action, including termination, consistent with local law.

Bribery is a criminal offense. As an employee you will be accountable whether you pay a bribe yourself or whether you authorize, assist, or conspire with someone else to violate an anti-corruption or anti-bribery law. Punishment for violating the law are against you as an individual and may include imprisonment, probation, mandated community service and significant monetary fines which will not be paid by SPM.

Questions or How to Raise a Concern

If you want to ask a question about the requirements in this policy or are concerned that an anti-corruption violation is occurring or has occurred, report it immediately to your manager or directly to SPM Instrument AB.

Policy Ownership

This Policy is owned by the Managing Director of SPM Instrument AB, Peter Lindberg peter.lindberg@spminstrument.se

The policies on this site apply to all employees of SPM Group.