



Anti-Bribery Policy and Procedures

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1. INTRODUCTION

- 1.1. Svenska (i.e. all direct and indirect wholly-owned or majority-owned or controlled subsidiaries, branches, delegations or representative offices of Petroswede AB, including where Svenska is acting as the operator for and on behalf of a joint venture and any of their majority-owned or controlled subsidiaries, branches, delegations or representative offices) is committed to complying with all applicable anti-bribery laws, including but not limited to the relevant Swedish, UK and U.S. laws as well as local laws in the countries where we have interests in licences or otherwise do business. In addition to Svenska's legal obligations, Svenska is also subject to contractual requirements introduced by our joint venture partners and other counterparties, demanding that we comply with laws, and Svenska expects the same from anyone with whom we do business.
- 1.2. It is a violation of this Policy and the applicable laws for Svenska's directors, officers, employees and consultants, as well as those acting for or on behalf of Svenska (jointly, "Svenska Representatives") to (a) directly or indirectly, give, offer, promise, receive, request, agree to receive or approve a bribe to or from any person in order to obtain or retain business for Svenska, or for any improper business purpose and (b) fail to maintain Svenska's books and records accurately and follow the internal accounting controls of Svenska in a way that detects and prohibits the recording of cost and benefits that could be construed as a bribe.
- 1.3. You must also continue to follow Svenska's Code of Conduct. This Policy is intended to supplement the Code of Conduct, which is incorporated by reference into this Policy.

2. WHY IS THIS IMPORTANT?

- 2.1. First of all, the taking and giving of bribes is illegal under the laws of most jurisdictions. If you engage in such activity, you expose yourself to criminal penalties which may range from fines to imprisonment. You also expose Svenska Representatives to liability for your actions.

- 2.2. Also, if you engage in some kind of bribery, such as “facilitation payments”, the associated Svenska asset may become “tainted” in the eyes of potential joint venture partners, financiers, farminees and acquirers, and your conduct may therefore decrease the marketability of our assets and therefore their value. You also expose other Svenska Representatives to a higher risk of being put under pressure to make similar payments. For example, you should assume that any public official that puts you under pressure to make a minor payment for the exercise of his or her duties (other than any fees determined by law or regulation) will know which company you represent and, if you agree to make such a payment, he or she will expect that any Svenska Representative will be prepared to do so. Accordingly, while you may think that you are addressing an immediate problem, you may create new problems for the future. Therefore there is also a strong business incentive to refrain from any kind of bribery, however minor the amount may seem at the time. Svenska will support a Svenska Representative that refrains from engaging in bribery, even though it may initially result in delays or missed business opportunities.
- 2.3. Further, companies that we do business with expect us to behave in an ethical and correct manner and to comply with laws at all times. A violation of this Policy is likely to create significant bad will and may result in loss of business and even termination of our licences. In addition, we, our partners and contract counterparties can face significant fines and penalties. Our contracts generally hold us responsible for any loss that our joint venture partners and other counterparties may suffer as a result of non-compliance by ourselves, which may lead to significant damages being payable by Svenska.
- 2.4. Svenska takes this very seriously, not least because we do business in parts of the world where, regrettably, bribery is very common. The fact that "others in the market do it", or "we have heard about such practices in the past", or that certain practices are "customs and traditions" or "local practice" does not make them acceptable, right or lawful. Violations of this Policy and/or anti-bribery laws can result in termination of agreements or termination of employment from Svenska for individuals, in addition to the criminal penalties to which you may become subject.

Dos and Don'ts

3. ANTI-BRIBERY POLICY

- 3.1. Svenska Representatives must never directly or indirectly, give, offer, promise, receive, request, agree to receive or approve a payment or anything of value, or an improper benefit of any other kind (such as recommendations, exclusive memberships etc.), directly or through third parties, to or from any person, in order to obtain business for Svenska, or to gain an improper advantage or benefit for Svenska; i.e. with the intent of influencing a person to do or stop doing something in violation of his or her legal duty. A payment will be improper even if the purpose is to influence the person to make a sound business decision. If you know or have reason to believe that an improper payment or benefit is intended to be passed on to a person by a broker, agent or other third party, you should report it to the Legal department, or you may create legal exposure for yourself and/or for Svenska.
- 3.2. Under no circumstance shall any Svenska Representative make, promise, offer or accept an improper payment, and all Svenska Representatives must take all reasonable steps and actions to avoid unintentionally making improper payments. Under this Policy:

- 3.2.1. improper payment means offering, authorising, directing, committing, promising, or providing anything of value, either directly or indirectly, to a public official or to an employee, director, officer, agent, consultant or representative of a commercial entity in an attempt to corruptly or improperly induce the recipient to obtain or retain business, influence government decisions, or secure or reward any other improper commercial or financial advantage, whether in the context of government interactions or any other commercial business, e.g. in connection with regulatory permits, taxation, customs, judicial and legislative proceedings. "Anything of value" is defined broadly and is not limited to money – it includes cash payments, gift cards, vouchers, goods, services, travel, meals, favours, benefits, special discounts, tickets to entertainment, memberships in social organisations or sporting clubs, conference fees, hotel rooms, transportation, honoraria, loans, assistance with medical care, membership in advisory boards or committees, charitable contributions, job offers, internships, secondments, political contributions, gifts (other than nominal), favourable terms of business, loan guarantees, investment or business opportunities, the use of property or equipment, anything that has value to the recipient or value to those the recipient cares about (family, friends, and business associates).
- 3.2.2. a public official means:
- 3.2.2.1. any person engaged in public duty in a government agency including any elected or appointed official or employee of a government, at any level including national or local government entities, members of legislative, administrative, and judicial bodies, as well as low-level employees of government agencies, such as office workers;
 - 3.2.2.2. any officer or employee of state-owned or state-controlled entities, including State-owned Enterprises that operate in the commercial sector;
 - 3.2.2.3. any officer or employee of a quasi-governmental organisation including organisations supported by the government but managed privately;
 - 3.2.2.4. any officer or employee of a public international organisation (such as the United Nations, the World Bank or the International Monetary Fund);
 - 3.2.2.5. any person acting in an official capacity for a government, government agency, or State-owned Enterprise (for example, someone who has been given authority by a government entity to carry out official responsibilities);
 - 3.2.2.6. any political party, official of a political party, and any candidate for political office;
 - 3.2.2.7. Head of State (for example, prime minister, president, king, queen, prince, princess);
 - 3.2.2.8. Royal Family Member;

- 3.2.2.9. judge, magistrate, legislator or politician;
 - 3.2.2.10. employee of a government sponsored pension or retirement plan; and
 - 3.2.2.11. the relatives of any public official.
- 3.3. State-owned Enterprises are enterprises where a government authority or state has significant control, through full, majority, or significant minority ownership. Ownership may be direct or indirect but is generally understood to amount to at least 10% of the ownership of the enterprise.
 - 3.4. Improper payments to or by any entity or person (such as a relative or friend) related to any such entity or person is likewise prohibited.
 - 3.5. This Policy prohibits an offer or promise of an improper payment, even if the public official or commercial person rejects the offer, or it fails to bring about the desired outcome.
 - 3.6. Svenska Representatives must not offer, provide, authorise, approve, direct, request or receive improper payments or anything that could give the perception of an improper payment, either directly or indirectly, to or from any intermediaries such as agents, sub-contractors, consultants or other third parties. No Svenska Representative may perform his or her functions improperly, in anticipation or in consequence of any improper payment.
 - 3.7. Extortion or solicitation is the demanding of a bribe, whether or not coupled with a threat if the demand is refused. Bribery in this Policy includes extortion.
 - 3.8. Svenska or Svenska Representatives must not (i) kick back any portion of a contract payment to any entities or persons mentioned above, or (ii) utilise intermediaries such as agents, sub-contractors, consultants or other third parties, to channel payments to public officials, or to directors, officers or employees of the contracting party, or their relatives, friends or business associates.
 - 3.9. Bribery is prohibited irrespective of the value of the advantage, its results, perceptions of local customs, the tolerance of such payments by local authorities, or the alleged necessity of the payment in order to obtain or retain business or other improper advantage.
 - 3.10. Svenska Representatives must never accept a bribe, however disguised, from a counterparty or any other third party. All Svenska Representatives must promptly inform the person offering a bribe of this Policy and make every effort to refuse or return the bribe. If it is not possible to decline or return the bribe, the affected Svenska Representative must immediately report its receipt to the General Counsel.
 - 3.11. When Svenska Representatives are involved in making business decisions on behalf of Svenska, their decisions must be based on uncompromised, objective judgment putting Svenska's interests first. Svenska Representatives interacting with any person who has business dealings with Svenska (including suppliers, customers, competitors, contractors and consultants) must conduct such activities in the best interests of Svenska, using consistent and unbiased standards.
 - 3.12. Bribes are often disguised via false invoicing or false record-keeping, or where payments are improperly designated as "consultant" fees and the like. This is one reason why Svenska adheres to strict internal controls and record keeping requirements (see below).

4. REQUIREMENTS FOR ACCURATE BOOKS & RECORDS/ADEQUATE INTERNAL CONTROLS

- 4.1. Svenska is committed to keeping its books and records accurate, and to ensure that our accounts fairly reflect the transactions and activities of Svenska. Our company internal controls should provide assurances that company transactions are properly authorised by management, and that transactions are recorded as required for preparation of Svenska's financial statements, and in a way that Svenska's assets can be accounted for. Everyone to whom this Policy applies and who authorises a payment is expected to look out for irregularities and consult with the Legal department before proceeding with the authorisation. Please refer to the Svenska Know Your Supplier Policy for further details.
- 4.2. Typical "red flags" where further due diligence may be required before payment is authorised include (but are not limited to):
- 4.2.1. Payment to a person that is described in accounting entry as a "miscellaneous fee".
 - 4.2.2. Expense account reports seem incomplete or excessive or lack backing documentation.
 - 4.2.3. Description of a payment as an "overhead expense" instead of a "commission".
 - 4.2.4. Counterparty gives instructions that payments are to be made to a bank account held in the name of an individual rather than a corporate bank account.
 - 4.2.5. Abnormal cash payments.
 - 4.2.6. Pressure exerted for payments to be made urgently or ahead of schedule
 - 4.2.7. Payments being made through a third party country, e.g. goods or services supplied to country 'A' but payment is being made, unusually to shell company in country 'B'.
 - 4.2.8. Abnormally high commission percentage being paid to a particular agency.
 - 4.2.9. Private meetings with public contractors or companies hoping to tender for contracts.
 - 4.2.10. Lavish gifts being offered or received.
 - 4.2.11. Individual never takes time off even if ill, or holidays, or insists on dealing with specific contractors him/herself.
 - 4.2.12. Making unexpected or illogical decisions accepting projects or contracts.
 - 4.2.13. Unusually smooth process of cases where individual does not have the expected level of knowledge or expertise.
 - 4.2.14. Abusing decision process or delegated powers in specific cases.
 - 4.2.15. Agreeing contracts not favourable to the organisation either with terms or time period.
 - 4.2.16. Unexplained preference for certain contractors during tendering period.

- 4.2.17. Avoidance of independent checks on tendering or contracting processes.
 - 4.2.18. Raising barriers around specific roles or departments which are key in the tendering/contracting process.
 - 4.2.19. Bypassing normal tendering/contractor's procedure.
 - 4.2.20. Invoices being agreed in excess of contract without reasonable cause.
 - 4.2.21. Missing documents or records regarding meetings or decisions.
 - 4.2.22. Company procedures or guidelines not being followed.
 - 4.2.23. The payment of or making funds available for high value expenses on behalf of others.
- 4.3. All accounts, invoices, memoranda and records relating to dealings with counterparties should be accurate and complete in all material respects. Such documentation must be kept for a minimum of five years after the termination of the business relationship with the relevant counterparty.
- 4.4. No payments or transactions shall be kept "off the books" to facilitate or conceal improper payments. There should be no false or misleading accounting entries or expense claims relating to any payments.
- 4.5. Svenska Representatives must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our relevant policies and procedures and specifically record the reason for the expenditure.

5. FACILITATING PAYMENTS

- 5.1. So-called "facilitating payments", i.e., payments of smaller amounts to facilitate routine action by a Government Agency or similar authority are deemed as bribes under the laws to which Svenska is subject and are consequently prohibited under this Policy. Administrative fees or fees for fast-track services that are provided for by law or regulation can, however, be paid. Whenever in doubt, contact the Legal department.

6. BUSINESS ENTERTAINMENT, TRAVEL AND GIFTS

- 6.1. This Policy allows reasonable and bona fide hospitality which is directly related to the Svenska operations, e.g. to improve the Svenska image or establish cordial relations. However, care must be taken since hospitality and associated activities may amount to bribery, where there is an intention for a financial or other advantage to influence a public official in his or her official role and thereby secure a business advantage.
- 6.2. For guidance as to what would typically be deemed as reasonable, please refer to the following guidelines.
- 6.3. Svenska Representatives are not permitted to offer or receive the following types of entertainment or gifts.
- 6.3.1. Lavish or extravagant business entertainment (e.g., travel to golf outing in an exotic location; side trip from business meeting city).

- 6.3.2. “Gentlemen’s Clubs,” “Hostess Bars” or other entertainment that is sexually oriented, such as “adult entertainment”.
 - 6.3.3. Entertainment, gifts or travel paid for with personal funds in order to avoid seeking required approval or required reporting and recordkeeping.
 - 6.3.4. Meal, hotel, air and entertainment expenses for family members.
 - 6.3.5. Gifts that exceed local law amounts for gifts to a person in the country, or are otherwise expensive, and designed to impress or influence a person in a manner disproportionate to the business relationship.
 - 6.3.6. Cash, generous gift cards, or travellers’ cheques.
 - 6.3.7. Any gifts of other than nominal value (approximately US\$ 60).
- 6.4. Svenska Representatives must never ask for or accept gifts, gratuities or other items that benefit them personally. You are expected to exercise good judgment in accepting gifts. When accepting a gift, you should always disclose it to your supervisor, in order to maintain transparency. If you consider that a gift should, but at the time cannot be rejected without embarrassing your host, you may accept the gift but must immediately disclose it to your supervisor and discuss an appropriate response. For example, Svenska Representatives are sometimes invited to conferences where third parties seeking to promote their products or services may cover all or a large portion of the attendees’ conference costs, meals and accommodation. Attendance at such conferences may be appropriate, if attendance serves a definite business purpose for Svenska. You should always consult the Legal department and your supervisor before signing up for such conferences.
- 6.5. All meal expenses provided by Svenska Representatives or third party representatives should generally be limited per individual in accordance with the amounts below. Meals in excess of the following amounts are generally considered excessive and must be pre-approved in writing by the relevant Svenska Representative's immediate manager and the General Counsel.

Geographical regions	Breakfast/Lunch	Dinner
Tier 1 countries (U.S., Canada, Western Europe, Middle East, Australia, Singapore)	US\$ 25	US\$ 50
Tier 2 countries (Eastern Europe, Russia, South Africa, Latin America, China, India, Indonesia, Thailand)	US\$ 15	US\$ 30

- 6.6. The following expenses are permitted under this Policy, subject to local law and on the basis that they are infrequent and related to a legitimate business purpose, and provided that they must never be given with the intent of exercising improper influence over the recipient’s decision.
- 6.6.1. Providing reasonable and proportionate meals and entertainment to representatives of private non-government companies.

- 6.6.2. Svenska hosts one of our nearby community projects for public officials to observe, and covers the reasonable cost of transportation (in appropriate class of travel), meals, and hotel for the public officials for the duration necessary to enable such observation. The invitation should be directed to the relevant organisation, and not to the individual.
- 6.6.3. Svenska hosts a meeting at a local conference centre for public officials to discuss upcoming plans for Svenska's operations in the country, with a proportionate and reasonable working lunch and/or dinner included.
- 6.7. Consult the Legal Department if you are unsure whether a person you are dealing with is a "public official" or whether the expense is appropriate. Note that specific caution is warranted in dealings with public officials during government negotiations, e.g., in conjunction with a licensing round or when a government approval is being processed. A meal should never be the primary purpose of a meeting.
- 6.8. Generally speaking gifts or entertainment to public officials are not allowed at all but if in exceptional situations it is deemed necessary it must be separately verified that offering such gifts or entertainment is legal in the country in question, including invitations to public officials to business promotional events. An approval form must be sought prior to providing any gift, meal, entertainment or travel to a public official, regardless of value. The approval form must state that in the exceptional circumstance that a gift, meal, entertainment or travel is to be provided to a public official, it is solely in association with a lawful business purpose and not with the intent to exercise improper influence, the specific business purpose should be clearly stated, and the form be signed by the relevant Svenska Representative's immediate manager and the General Counsel.
- 6.9. An exception to the above requires justification in writing and prior written approval by the General Counsel. Any such justifications and approval forms must be retained by the General Counsel.
- 6.10. Paying for or reimbursing travel or visitor expenses with the intention or appearance of improperly influencing a public official or private individual in order to obtain a business advantage for Svenska, or for any other corrupt purpose, is strictly prohibited.
- 6.11. All expenses in the acceptable examples must be documented, and receipts maintained. Failure to do so could create serious legal exposure for Svenska Representatives, joint venture partners, and third party representatives, as well as Svenska. Note that in some jurisdictions, most entertainment of or gifts to some public officials are prohibited by law. Therefore, consult the Legal department before incurring such expenses abroad.
- 6.12. All gifts, meals, travel and entertainment expenses, irrespective of value, must be accurately and fully documented in writing and reflected in Svenska's Register of Corporate Entertainment, Gifts and Hospitality (see Appendix 1), which contains the details to be provided.
- 6.13. Such records of gifts given, hospitality and travel expenses incurred (including receipts and the approval form) must be provided to the General Counsel, who will maintain them for a minimum of five years.

7. DONATIONS TO POLITICAL CANDIDATES OR CHARITIES ON BEHALF OF SVENSKA

- 7.1. It is against this Policy and Svenska's Code of Conduct to make contributions to candidates for

any foreign or domestic political office with the intent to gain an improper advantage or benefit for Svenska or otherwise on behalf of Svenska.

- 7.2. No Svenska Representative is permitted to make a charitable donation to a charity on behalf of Svenska without prior review and approval of senior management, in consultation with the Legal department. This is because a bribe may take the form of charitable contributions or sponsorships and Svenska has to seek to ensure that there are, for example, no family ties or commercial connections between the charity and a public official, nor can there be any prior history of corruption. Another warning sign would be where a charity is specifically proposed or suggested by a public official. Any donations will be particularly sensitive if Svenska (or an operator of a licence where Svenska is a partner) is in negotiations for a licence, an extension, or similar government action. However, while the risks associated with charitable donations require proper review of any project that Svenska undertakes, Svenska wishes to continue to take active corporate social responsibility. Svenska Representatives should continue to feel welcome to suggest projects that may be the right fit for Svenska so that they can be assessed.
- 7.3. Minor donations or sponsorships of nominal amounts made to locally registered and reputable charities in the UK or Sweden, which are of a nature that generally attracts corporate sponsorship (e.g., “Blodomloppet”, “Walk for Cancer”) may be made provided that they are not made with the intent of gaining a business advantage or benefit or otherwise improperly influencing another person in the conduct of his or her duties.

8. THIRD PARTY RELATIONSHIPS AND FARM IN ACTIVITIES

- 8.1. Svenska requires Svenska Representatives to conduct appropriate anti-bribery and reputational due diligence for all prospective partners and third party intermediaries. Due diligence will help prevent breaches of this Policy and breaches of anti-bribery law involving a third party representative. Svenska Representatives should also report to the Legal department any anti-bribery “red flags”, because actions of Svenska’s agents and representatives can create criminal and civil liability under anti-bribery laws for Svenska Representatives. Completion of due diligence and continued compliance is the responsibility of the project manager that engages the third party. However, the appropriate level of due diligence will vary depending on an individual risk assessment in each case. For guidance on the level of due diligence required, consult the Legal department which will provide checklists, questionnaires and other useful tools.
- 8.2. Any third party representative must confirm their adherence to this Policy in writing (by signing a consultancy agreement), and should undergo compliance reviews prior to any amendment or renewal of the relationship, to determine their compliance with this Policy and contractual requirements, as well as to ensure their execution of new anti-bribery certifications, as required. More frequent reviews may be required in high risk relationships.
- 8.3. Svenska is required to perform reasonable anti-bribery due diligence on joint venture partners and target companies for acquisition before finalising the farm in or acquisition. Such due diligence will be coordinated by the Legal department.
- 8.4. All contracts entered into or renewed with third parties should incorporate relevant compliance requirements. Contact the Legal department to obtain appropriate language.

9. MONITORING, TRAINING AND COMMUNICATION

- 9.1. The Management Team will oversee and supervise periodic compliance audits that assess the level of employee and business unit compliance with this Policy, and also whether additional

procedures are necessary to meet Svenska's dynamic operating needs and compliance risks.

- 9.2. The Legal department will oversee and coordinate periodic training on this Policy. Any amendments and updates of the Policy will be communicated in accordance with the procedure for amending the corporate Administration Manual.

10. REPORTING SUSPECTED VIOLATIONS

- 10.1. Any Svenska Representative who learns information about a suspected violation of this Policy and/or anti-bribery laws must report it to a supervisor, or to the Legal department (the supervisor must report it to the Legal department). Svenska prohibits retaliation against a Svenska Representative who makes a report of a suspected violation of this Policy and/or anti-bribery laws in good faith.
- 10.2. This Policy does not address every aspect of anti-bribery compliance. It is designed to provide guidance for Svenska Representatives and business partners. These guidelines are in addition to the guidelines set forth in the Code of Conduct and any other policy, code or guideline established by Svenska with respect to the conduct of Svenska Representatives.

11. CONFLICTS OF LAW

- 11.1. As a result of the expansion of anti-bribery and anti-corruption laws in countries where Svenska does business, Svenska Representatives could encounter situations where local law is inconsistent with the UK Bribery Act 2010, the U.S. Foreign Corrupt Practices Act 1977, or other applicable laws. If Svenska Representatives are confronted with such a conflict, they should contact the General Counsel for advice before proceeding.

APPENDIX 1 – REGISTER OF CORPORATE ENTERTAINMENT, GIFTS AND HOSPITALITY

The Svenska Group Anti-Bribery Policy and Procedures do not prohibit normal and appropriate entertainment, gifts or hospitality, whether given or received, to or from third parties. However any such practices must be proportionate, reasonable and made in good faith. Under English and U.S. laws, Svenska is obliged to keep clear records of all such entertainment, gifts and hospitality.

You **are permitted** to give or receive entertainment, gifts or hospitality on behalf of Svenska provided that:

- It is not made with the intention of influencing you (in the case of receiving a gift) or a third party (in the case of giving a gift) to perform your/their duties in an improper manner such as obtaining or retaining a business advantage, rewarding the provision of a business advantage or the exchange of favours and/or benefits;
- It complies with local law, especially if Svenska is conducting business outside the UK;
- Taking into account all the circumstances it is proportionate and given or received at an appropriate time;
- It is given or received openly and is not secretive in nature;
- It does not include money or money equivalent, such as gift certificates;
- In relation to government officials, it is not given or received without prior approval of the Legal Department.

As a general rule, small tokens of appreciation (value of less than approximately \$60) such as flowers, calendars, diaries or a modest bottle of wine, or being taken out for coffee or lunches when part of a business meeting do not need to be recorded.

All other entertainment, gifts and hospitality, whether offered and accepted, or offered and refused, must be recorded in the attached forms. The first form is for situations where the Svenska Representative is giving or offering some form of entertainment, gift or hospitality; the second is for the situation where the Svenska Representative is receiving or being offered some form of entertainment, gift or hospitality.

It is **not** acceptable for a Svenska Representative (or someone on their behalf) to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received or to reward the provision of a business advantage;
- Give, promise to give, or offer a payment, gift or hospitality to a government official or their agent with a view to expediting a routine procedure;
- Accept a payment or a gift from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- Threaten or retaliate against another worker that refuses to commit a bribery offence or who has raised concerns under the Svenska Group Anti-Bribery Policy and Procedures; or
- Engage in any actions that may lead to a breach of the Svenska Group Anti-Bribery Policy and Procedures.



RECORD OF ENTERTAINMENT, GIFTS AND HOSPITALITY GIVEN BY OR ON BEHALF OF SVENSKA

	Date of entry in the Register	Details of the Entertainment, Gift or Hospitality given by Svenska or a representative of Svenska	Entertainment, Gift or Hospitality?	Name of Svenska Representative	Name of guest	Business relationship of guest to representative of Svenska	Cost or Approximate value	Did the Svenska Representative attend?
1.								
2.								
3.								
4.								



RECORD OF ENTERTAINMENT, GIFTS AND HOSPITALITY RECEIVED BY OR ON BEHALF OF SVENSKA

	Date of entry in the Register	Details of the Entertainment, Gift or Hospitality received by Svenska or a representative of Svenska	Entertainment, Gift or Hospitality?	Name of Svenska Representative (s)	Name of host	Business relationship of host to representative of Svenska	Cost or Approximate value	Accepted or Declined?	Did the host representative attend?
1.									
2.									
3.									
4.									