

## **Mycronic Group Anti-Corruption Policy**

### **Introduction and Purpose**

The purpose of this Anti-Corruption Policy (the "Policy") is to clarify the rules applied by Mycronic AB and its Group Companies ("Mycronic"). The Policy reinforces the expectation that no employee, director consultant or person performing services for Mycronic, or on behalf of Mycronic, is to give or receive bribes of any kind.

Acts in violation of this Policy will cause damage to Mycronic's reputation and may lead to legal action against Mycronic and its employees. It may also be a breach of the terms of employment and may lead to labor law actions.

If you are in doubt about the applicability of this Policy, advice may be obtained from the General Counsel.

The Policy shall be applied throughout Mycronic operations, worldwide, as well as by any party that contributes to Mycronic products, services and other business activities.

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## 1 Definitions

Corruption	The abuse of entrusted power for private gain.
Bribery	Giving or offering, requesting, accepting, receiving or authorizing gifts, payments or any other advantage that could influence or appear to influence a business decision or the action or decision of a public official.
Conflict of interest	Arises when financial or other personal consideration could influence or appear to influence a person's loyalty and professional judgement and performance of his or her duties.
Facilitation Payments	Payments made to speed up administrative or other routine tasks.

## 2 Key Principles

Mycronic shall conduct its business in full legal compliance. Mycronic applies zero tolerance for corruption. This means that we don't, under any circumstances, engage in, encourage or tolerate extortion and/or bribery through payments or other benefits to public officials, commercial enterprises or anyone else with the aim of obtaining or retaining business or any other advantage.

## 3 Bribery and Corruption

Bribery and any other form of corrupt business practice is strictly prohibited. Neither Mycronic nor anyone acting on Mycronic's behalf may accept, authorize, promise, offer or make available any payments, gifts or other benefits that could influence or appear to influence business decisions or the actions or decisions of a public official or others.

It is also prohibited to contribute financial means to any third party in a way that could constitute negligent financing of corruption. Due care should be exercised to ensure that money paid to third parties, for example agents, partners, vendors and consultants, is not used for corruption.

## 4 Conflict of interest

All Mycronic employees, consultants and partners are expected to exercise sound judgement unaffected by private interests or divided loyalties and must avoid an interest or situation that conflicts, or may appear to conflict, with their professional duty.

## 5 Third Parties

Due care should be exercised when engaging with third parties, e.g. customers, suppliers, agents, distributors, intermediaries and other business partners.

In order to accurately identify and prioritize the risks of corruption that Mycronic may face in relation to specific business partners, risk assessments may need to be performed. The risk assessments and the conclusions shall be accurately and appropriately documented.

In order to identify and prevent bribery risks, appropriate due diligence may also need to be carried out on third parties. The procedures shall be proportionate to the risks identified. If the relationship has lasted for a long time or if there are changes in circumstances recurring due diligence may be necessary.

In certain circumstances, business partners shall be required to give anti-bribery warranties and similar consents.

## **6 Gifts, Entertainment and Hospitality**

No Mycronic employee or any other person acting, may promise, offer, grant or receive gifts or benefits of any kind if it could influence, or appear to influence, the receiver to do something in return, such as the awarding of a contract.

Gifts, hospitality or entertainment which are not approved in advance by a representative of Mycronic with appropriate authority; are excessive or lavish by reference to the recipient or in the context in which they are offered or promised; or are promised, granted or offered with the purpose of influencing a decision relevant to the business are strictly prohibited.

Gifts and hospitality may only be accepted when they comply with the Gifts, Entertainment and Hospitality Instructions. The instruction can be accessed in the Lobby CO document center.

## **7 Public Officials**

Neither Mycronic nor any person acting on Mycronic's behalf may offer a bribe of any kind to a public official or to any other person at the request or suggestion of a public official, or offer hospitality or gifts that are lavish or breaches the gifts and entertainment policy by which the public official is bound.

## **8 Facilitation Payments**

Facilitation payments are payments to public officials for carrying out or speeding up procedures. Making or accepting facilitation payments is strictly prohibited. Anyone that is asked/encouraged to make a facilitation payment must report it to his or her manager, along with a description of the circumstances in which the payment was made and /or suggested.

## **9 Sponsorship**

Payments in connection with sponsorship agreements should only be made in accordance with Mycronic's Sponsoring Policy and must be approved in advance by a representative of Mycronic with appropriate authority.

## **10 Charitable and Political Donations**

Donations promised or granted with the purpose of influencing a business decision or not approved in advance by a representative of Mycronic with appropriate authority is prohibited.

If a business partner asks Mycronic to make a charitable donation this must be reported to the General Counsel. In such circumstances, a donation may only be made when appropriate due

diligence has been carried out establishing that there is no suggestion that the donation is intended to influence a business decision, action or other decision by any public official

Political donations are strictly prohibited.

## **11 If you are offered an improper benefit**

Reject the benefit. If the situation does not allow for rejecting the benefit without damaging the relationship with the counterparty, inform your manager thereof as soon as possible for his/her handling of the matter together with HR (as appropriate).

## **12 Keeping Records**

Accurate and transparent records shall be kept at all times. This includes the record keeping of gifts, hospitality, sponsorships and donations in order to reflect the nature and purpose of the activity. Records shall also be kept of the required approval documents and verification of third parties. These requirements shall be implemented through Mycronic's accounting rules and procedures on a local level.

## **13 Communication and Training**

All Mycronic employees and consultants shall receive information regarding this Policy. Employees and consultants working in higher risk functions, such as within customer or vendor facing roles, e.g. sales, marketing and procurement, and employees and consultants having contact with public officials or where it is otherwise relevant shall participate periodically in appropriate training sessions.

## **14 Monitoring, Evaluation and Review**

It is the responsibility of Mycronic managers to ensure that its employees and consultants are informed, understand and adhere to this Policy. Partners are responsible for controlling their employees and subcontractors compliance with the Policy.

The adherence to this Policy shall be regularly evaluated by Mycronic.

The content of this Policy shall be reviewed on a regular basis in order to ensure that the rules set out herein remain appropriate, and in order to determine whether further guidance or elaboration is needed.

## **15 Reporting**

All employees are expected to report to the nearest superior any observed or suspected violation of this Policy. Partners shall immediately report any non-compliance with this Policy to its Mycronic representative. Violations may also be reported via Mycronic's whistleblowing system <https://report.whistleb.com/mycronic>.

Further details on how to use the whistleblowing system is set out in Mycronic's Whistleblowing Policy.