

Mycronic Group Anti-Corruption Policy

Introduction

The purpose of this Anti-Corruption Policy (the "Policy") is to lay down the rules to be applied at Mycronic AB and its Group companies ("Mycronic") in order to prevent any employee, director, consultant or person performing services for Mycronic, or on behalf of Mycronic, from giving or receiving bribes of any kind.

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 ("Partner").

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Anti-Corruption Policy

1 Objectives and General Principles

Mycronic applies no tolerance for corruption. This means that we must not under any circumstances be engaged 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.

2 Purpose of the Anti-Corruption Policy

The purpose of this Anti-Corruption Policy (the "Policy") is to lay down the rules to be applied at Mycronic in order to prevent any employee, consultant or person performing services for Mycronic, or in Mycronic's name, from giving or receiving bribes of any kind.

The Policy shall be applied throughout the Mycronic's operations, worldwide, as well as by any party that contributes to Mycronic products, services and other business activities ("Partner").

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

If in doubt about the applicability of the Policy advice may be obtained from the Legal department.

3 Key Principles

- Mycronic shall conduct its business in full legal compliance.
- Bribery and any other form of corrupt business practice are 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.
- 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.
- 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.
- Mycronic does not permit the making of facilitation payments to induce public officials to perform their duties.

4 Corruption

Corruption is the abuse of entrusted power for private gain.

5 Bribery

A bribe means offering, providing, authorizing, requesting, accepting or receiving a financial or another advantage with the purpose to encourage improper performance or to misuse a person's position. A bribe does not necessarily involve money.

6 Conflict of Interest

Conflict of interest occurs when financial or other personal considerations may – or may appear to – affect a person's loyalties and professional judgement and performance of his or her duties.

7 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.

8 Gifts, Entertainment and Hospitality

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

Gifts and hospitality may only be accepted when they comply with Mycronic policies and procedures.

Giving, offering, receiving or soliciting gifts, entertainment and hospitality are prohibited if they are:

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

9 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 breach the gifts and entertainment policy by which the public official is bound.

10 Facilitation Payments

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

11 Sponsorship

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

12 Charitable and Political Donations

Charitable donations must not be promised or granted with the purpose of influencing a decision relevant to the business of Mycronic.

Mycronic prohibits charitable donations to entities which are not established charities with recognized charitable aims.

Charitable donations must be approved by a representative of Mycronic with appropriate authority.

Political donations are strictly prohibited.

Where a business partner asks Mycronic to make a charitable donation, this must be reported to Mycronic's Legal department. In such circumstances, the donation may only be made where appropriate due diligence has been carried out which has established that there is no suggestion that the donation is intended to influence a business decision, or other action or decision of a public official.

13 Keeping Records

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

14 Communication and Training

All Mycronic employees and consultants shall receive information on 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 also participate periodically in appropriate training sessions.

15 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 that their employees and subcontractors comply with the Policy.

The observance of 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 is needed.

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.