

Anti-bribery and anti-corruption Policy

Document

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Approved by

Management Team & Board of Directors

Owner

General Counsel & EVP
Corporate Legal Department

Anti-bribery and anti-corruption policy

Beijer Ref's position is that bribery and corruption are unethical and unacceptable and are inconsistent with our values and our Code of Conduct. The reputation and long-term success of Beijer Ref is and will continue to be based on integrity. This policy will also guide us acting true to our values; Committed, United, Engaged and Straightforward.

The Board of Directors of Beijer Ref AB (publ) has adopted this Anti-Bribery and anti-corruption Policy (the "Policy"). Beijer Ref AB (publ) and the other companies in the group ("Beijer Ref") are affected by anti-bribery rules, which regulate the manner in which Beijer Ref shall behave. The operational responsibility for implementing this policy resides with all Executive Management team members within their respective area of responsibility. This Policy explains our individual responsibility to comply with anti-bribery and anti-corruption laws around the world and to ensure that any third parties that we engage to act on our behalf, do the same.

Bribery is the offering, providing, authorising, requesting, accepting or receiving of a financial or other advantage in order to encourage improper performance or to misuse a person's position. A bribe can be anything of value and does not necessarily involve money. Corruption is the abuse of an entrusted power for private gain.

Objectives, Scope and Aim

This Policy is mandatory and applies to all Beijer Ref companies and all its directors, officers and employees, including contract employees (collectively referred to as "Beijer Ref" or "you/we"), in all markets and at all times. Beijer Ref has companies in many parts of the world, whereas each company is responsible to follow their local, additional, rules. This Policy sets out the minimum requirements to abide by. It is valid for acts, omissions, and decisions from its effective date and onwards (no retroactive effect).

The Policy is a tool to assist Beijer Ref's employees in identifying and reporting situations that may raise concern from an ethical or legal perspective. This Policy aims to:

- Set out standards to prevent, to deter and to detect bribery and corruption in our business.
- Emphasise Beijer Ref's continuous awareness to comply with international and national anti-bribery and anti-corruption regulations.
- Create awareness among Beijer Ref employees regarding these issues.
- Give guidelines helping Beijer Ref and its employees to act within boundaries of anti-bribery and anti-corruption laws.

General principles

Bribery is strictly forbidden within the Beijer Ref Group. This means we do not offer, authorise or pay bribes or anything of value to obtain or retain business, or to encourage or reward a decision.

No employee of Beijer Ref shall offer, provide, authorise, request, accept or receive a bribe either directly or indirectly, including through any third party.

A member of the Group's Executive Management Team shall, if not stated otherwise, be entitled to approve exceptions from the guideline below in an individual case. Also the Grandfather principle shall be applied for exceptions, which means that a manager's manager shall approve exceptions.

Conflict of interest

At Beijer Ref we avoid an interest or situation that conflicts, or may appear to conflict, with our professional duty. A conflict of interest occurs when financial or other personal considerations may – or appear to – affect an employee's loyalties, professional judgement, and performance of duty. Beijer Ref employees are expected to always act in Beijer Ref's best interest and to exercise sound judgement, unaffected by private interests or divided loyalties.

Gifts

Gifts and activities should never be given or received on such a scale that they improperly affect, or may be deemed to improperly affect, the outcome of a procurement or other business transactions. Gifts are only offered or accepted within the limits of local legislation. Employees can only accept gift proposals if they are open, reasonable, demonstrate a clear business objective and are appropriate for the nature of the business relationship. Monetary gifts, personal gift cards or vouchers are always forbidden.

Hospitality

Customary hospitality which includes business purpose with an agenda is permissible. When Beijer Ref offer hospitality trips to customers and business partners they should go to countries in which Beijer Ref has business operations.

Employees can only accept business hospitality proposals if they are open, reasonable, include a business objective and are appropriate for the nature of the business relationship. The general rule is that private companions, such as spouses, should not join on business trips. If they do, all extra costs should be paid privately.

Hospitality at venues that can be perceived as unethical or that could be perceived as offensive, such as at strip clubs, is always prohibited.

Facilitation payments

Beijer Ref do not make any kind of facilitation payments, i.e. payments made to government officials to encourage or ensure that routine procedures are carried out or speeded up, such as but not limited to issuing permits, immigration controls, providing services or releasing goods held in customs. Beijer Ref does not permit facilitation payments, even in countries where they are permitted.

Political contribution and donations

It is never acceptable to make any contributions or donations to political parties or committees, individual politicians or candidates for public office or political organisations.

Financial recording

Beijer Ref keep accurate and transparent financial book and records in accordance with generally accepted accounting practices. This includes the requirement that gifts and hospitality as well as sponsorships and donations are recorded to reflect the nature and purpose of the activity.

Design firm finder's fee

What is a "Design Firm Finder's Fee": Any payment offered or made by Beijer Ref to rewarding designers, engineers, and technical consultants in connection with a project where such firm has been hired by the customer, developer or end-user to provide technical design or product specification services. Design Firm Finder's Fee payments may only be made in strict accordance with the Policy on rules for application of Design Firm Finder's Fee which you will find in Appendix A.

Responsibility

All employees are personally obliged to follow the laws, regulations, regulatory requirements, and guidelines associated with anti-bribery and anti-corruption legislation. This Policy sets out minimum rules and guidelines; if stricter regulations and/or rules applies locally, they should be followed.

Violation of bribery and corruption rules is criminalized in many countries and can result in imprisonment, bad reputation, fines and damages. Non-compliance with this policy will result in investigations and can lead to appropriate disciplinary sanctions including termination of employment.

Ultimately, Beijer Ref's managers are responsible for ensuring that the policy has been communicated to employees and to relevant external parties to promote broader knowledge and use of the policy.

Training

All employees within Beijer Ref is trained in anti-bribery. Employees with relevant positions receives extended training. At Beijer Ref Academy – Ethics and Compliance Centre, you will find suitable courses that intends to provide the employees with a comprehensive and general knowledge on this topic.

However, the information cannot give you guidance on how to follow the relevant rules in every situation or provide detailed answers on all the practical questions that may arise in the day-to-day work.

Therefore, always consult your immediate manager, the HR or Legal department in case of any questions or uncertainties for guidance on how to apply the Policy and anti-bribery and anti-corruption laws in a specific case.

Reporting/Questions

On the detail level, rules, guidelines and procedures might vary between countries. If you are not sure what applies contact your immediate manager, your Managing Director or the HR or legal department or read more in country-specific documents.

All employees are encouraged to reveal behaviour that may not be compliant with this Policy. Raise the issue to immediate Manager, your Managing Director or if this is inappropriate reports may be done anonymously and confidentially by the use of Beijer Ref's whistle-blowing function.