

# Brandon Code of Ethics

Brandon believes in honesty and fair play and considers that gifts in business are unnecessary and might even jeopardize a cordial and mutually beneficial business relationship. We therefore, do not permit our staff to ask for any advantage, including gifts, money or rebate, in business dealings. We operate a strict code of acceptance and all our staff are aware of this policy and that breaches would result in disciplinary action.

We therefore seek your co-operation not to offer any advantage to our staff in business dealings and would be grateful if you would report to the management in Sweden, all attempts by any member of our staff to solicit any advantage from your company.

## Personal conduct of employees

### Prevention of Bribery

Any employee soliciting or accepting an advantage in connection with his/her duties without the permission of the Company permits an offence.

The term "advantage" is defined in the ordinance and includes gift, loan, fee, reward, employment, contract, service and favor.

### Soliciting advantages

It is the policy of the Company to prohibit employees to solicit any advantage from clients, suppliers or any person in connection with the Company business.

### Accepting advantages

Employees should decline advantages offered in connection with their duties if the acceptance of advantages could affect their objectivity or induce them to act against the Company's interests or lead to complaints or bias.

Employees could consider accepting voluntarily given advantages only if:

- The acceptance will not influence the performance of the recipient.
- The recipient will not feel obliged to do something in return for the giver.
- The recipient is able to openly discuss the acceptance without reservation and the nature (i.e advertising or promotional gift, customary gift) and the value (i.e not exceeding USD 50.00) of the advantage are such that refusal could be seen as unsociable or impolite.

In case of doubt, the recipient should contact the management for advice.

### Accepting advantages

Under no circumstances may an employee offer advantages to any person or Company for the purpose of influencing such person or Company to favor the Company in any way.