

Company/Department: OX2 Group AB / Finance	File name: Policy against corruption	Decided by/Date: The Group management / 11/11/2016
Written by/Date: CFO / 11/11/2016	File responsible: Sara Ottosson	Revised by/Date: Sara Ottosson 11/10/2017

## OX2 Policy Against Corruption

Applies to the following companies within OX2  
and when applicable their branches

- OX2 Bio AB
- OX2 Bio Produktion AB
- OX2 Construction AB
- OX2 Group AB
- OX2 Technical and Commercial Management AB
- OX2 Wind AB
- Utellus AB
- Enstar AB

### 1. OX2 policy is inspired by UN Global Compact's principle against corruption

The 10<sup>th</sup> principle read: Businesses should work against corruption in all its forms, including extortion and bribery.

Read more at: <https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-10>

### 2. Receiving gifts and hospitality

Employees should not accept any gifts other than promotional items of nominal value, normally bearing a company logo.

Before you accept an invitation to an event, it is always important to ensure that participation has a clear business purpose.

OX2 shall cover necessary and appropriate travel and accommodation expenses for OX2 employees for representation events.

Employees shall be open with their superior on everything relating to the acceptance of gifts, hospitality and so forth. If in doubt it is always better to seek approval from superior for attending an event prior to accepting the invitation.



### **3. Gifts and hospitality towards others**

Arranging different social activities in connection to different occasions (FC)/ client's meetings can be justifiable if there is clear business reason for it, the social activity is small part of the total program and the total cost for it is kept within reasonable limits. As a general principle OX2 will not pay for customers' travel and accommodation expenses.

### **4. Working with intermediaries/agents/consultants**

Although a proper integrity due diligence and background check of counterparties can be impractical and expensive for all occasions, OX2 shall act with care when entering into agent-relationships and do reasonable reference checks on the individual and/or company in question.

All agreements with intermediaries should be in writing and in line with national law and according to the requirements of OX2 Code.

All agent agreements shall be approved by OX2 Wind management regarding agent agreements within Wind business and OX2 Group Management regarding other businesses within OX2.

### **5. Reporting of potential policy breach**

All OX2 employees are responsible to be vigilant in regard to signs of potential corruption and should report any such breach to senior OX2 management without delay. If that is not possible of any reason the reporting can be done through the OX2 whistleblower system via web portal

**<https://report.whistleb.com/sv/OX2Group>**

### **6. Corruption and social investments**

Particular care is required when dealing with public officials.

No advantages to decision makers, public officials, family members or others close to such a person should be given. Making donations to beneficiaries who are themselves, or related to, decision makers on outstanding bids or similar type of decision is not permitted.

### **7. Facilitation payments**

The UN Convention against Corruption prohibits facilitation payments. In most countries, it is illegal to offer and demand such payments.