

# Anti-corruption policy

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## 1. Background

Vasakronan has a zero-tolerance corruption policy. Corruption means that someone abuses their position of trust to their own benefit. This can entail providing or accepting unfair benefits. Corruption hurts business and hinders investments, jeopardises high social standing, decreases trust in public institutions and the market economy. All forms of corruption must be combated, which is why this anti-corruption policy has been developed. The policy applies to, and is to be adhered to by, all employees at Vasakronan.



## 2. Main principles

Vasakronan's main principles in its anti-corruption agenda are:

- All employees are to follow the applicable laws and ordinances
- Operations are to be characterised by professional behaviour and integrity, and Vasakronan also strives for this in relation to its tenants, suppliers and other partners
- Vasakronan does not accept giving, taking, offering or requesting any kind of bribe
- Anyone who reports an alleged impropriety shall never suffer retaliation

## 3. Preventive efforts

Vasakronan actively works to prevent corruption, including the following:

- Creating a corporate culture built on strong values, and foundational values of high ethical standards, a holistic approach and a humanistic outlook
- Working according to a structured procurement process
- Having a system that makes it easy for employees and partners to anonymously report suspected improprieties or breaches of law
- A code of conduct encompassing all managers and employees in the company, and a code of conduct for suppliers that is implemented in all procurements

## 4. Hospitality and gifts

- The catchwords at Vasakronan when it comes to hospitality and gifts are moderation and good judgement.
- Vasakronan neither offers nor accepts anything that can undermine the company's respectability and professionalism. No one who accepts an offer or gift from Vasakronan should need to consider if it is lawful.

Obviously, our hospitality always has a natural connection with our operations.

The Swedish Anti-Corruption Institute has developed a Business Code with guidelines for private companies that includes all types of gifts, rewards and other benefits – even those without economic value. Vasakronan follows the Business Code applicable at any given time.

As a supplement to the Business Code, the following applies:



#### **4.1 What may we give and offer?**

Individuals at government agencies that exercise authority, such as decision-makers, planning or permit officials, judges, etc. may not be offered free hospitality, nor should any gifts be provided to these individuals.

##### **Gifts**

Overall, we are restrictive with gifts. In specific cases such as celebrations, anniversaries and the like, a gift may be given to individuals at private companies and individuals employed at government agencies if they work with administrative tasks and do not exercise any authority. Gifts are primarily in the form of money donated in the individual's/company's/agency's name to some worthy cause. We choose Save the Children, the WWF Östersjöstiftelsen or Stockholms Stadsmission. The gift may amount to no more than SEK 500, and for agencies no more than SEK 300. It is always better to donate in the company's/agency's name than that of the specific employee/manager.

##### **We may offer**

Agency employees who work with administration and who exercise no authority may be offered a simple lunch in connection with a work meeting or seminar directly related to their work and our operations.

Individuals at private companies may be offered:

- Work meals or similar in connection with work.
- Athletic events and entertainment of a moderate value. Note that if the meal is included, the total amount is calculated and the total value should not exceed SEK 500.

Arrangements other than the above can be approved if they follow the Business Code. All arrangements outside of the above categories must be approved by the immediate manager and the General Counsel. Approval must be acquired before the invitation is sent, and must include the arrangement's setup, the invitation's design and the individuals being invited.

An offer or gift should not be made too often to the same person, even if it falls within the framework below on every occasion.

#### **4.2 What can we accept?**

The same rules for what we can offer apply to what we can accept. An offer or gift should not be accepted too often from the same person, even if it falls within framework below on every occasion. However, employees at Vasakronan may accept a gift not covered by the policy below, provided that it is approved by the CEO or a manager directly under the CEO. Their approval must be acquired before the gift is accepted.

We always decline these offers:

- Discounts and bonuses that are not offered to every Vasakronan employee, kickbacks or monetary gifts
- Material or work that concerns private property
- Invitations to leisure activities such as trips, use of vacation homes, sailing tours, etc.

#### **5. Whistle-blower mechanism**

The company's employees and suppliers can anonymously report suspicions of improprieties, regardless of who the allegations concern, see more under "For suppliers" and "Whistleblower – it needs to be correct" on Vasakronan's website.

#### **6. Monitoring and penalties**

The company regularly trains suppliers for the organisation and the company in anti-corruption issues and monitors compliance with this policy and the Code of Conduct. Penalties can arise upon breach of this policy. A police report is always filed if a crime is suspected.