



**Eltronic Group**  
ENGINEERING IMPACT

# Anti-bribery/ Corruption Policy

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## 1 Scope

This policy applies to Eltronic Group and its subsidiaries. If a company stipulates a policy in compliance with separate laws and regulations, this policy can be denied.

## 2 Basis

The basis for this policy is always ruling national and international law. There can be specific regulations and “methods” locally, stipulating stricter regulations, in which case, this policy must be assessed and evaluated.

## 3 Purpose

The purpose of this policy is to govern all Eltronic Group related companies similar and within the same framework – as to uphold the highest standard for law obeying governance.

## 4 Target

Eltronic Group and its subsidiaries are expected to comply with this policy and the Group targets defined below. Furthermore, the subsidiaries are requested to formulate individual targets adapted to their context.

## 5 Ownership

This policy is owned and governed by Eltronic Group CEO, CFO, COO, and any other member of the C-level management of Eltronic Group subsidiaries. Including all-time members of the Board.

## 6 Evaluation

The policy is to be evaluated no less than one year from the approval date. Hereafter, the evaluation will be performed yearly and marked with the latest version number.

## 7 Policy

It is the policy of the Group that bribery, corruption, facility payments, and other unethical practices (hereafter corruption) undermine the confidence of its business environment (customers, suppliers, and all other business relations), which is key to its business success.

Therefore, we enact zero-tolerance against corruption and will exercise due efforts to secure that corruption does not occur in our business activities.

We do not tolerate either active or passive corruption, thus we may not give, receive or request payment that would influence the behavior of officials or business partners to obtain an improper or unlawful advantage.

Genuine hospitality is not prohibited but must be accepted, offered, or given in accordance with general acceptance and may not leave the customer, supplier, business partner, or own employee with an inappropriate impression of the purpose.

Any non-compliance to this policy may be reported directly and confidentially through the global whistleblower system.

## 7.1 Policy Statements

We will live up to our policy by:

Abiding by all applicable corruption rules and regulations in the countries we do business.

Maintaining an employee and supplier code of conduct to anchor the group rules in the businesses.

## 7.2 Group Targets

1. Performing anti-bribery training proportional to job function and country risk assessments.