

COMPLIANCE POLICY
Corruption and Conflicts of Interests Prevention Directive
Country Annex Sweden

This country annex sets out specific terms and conditions applicable in Sweden in addition to or in place of (as the case may be) the terms and conditions set out in the Corruption and Conflicts of Interest Prevention Directive adopted by POWERLINES Group’s management board (hereinafter referred to as “**Group Management Board**”) on 21.05.2024.

This Country Annex forms an integral part of the Corruption and Conflicts of Interest Prevention Directive and has thus been duly adopted at the same time and in connection with the adoption of the Corruption and Conflicts of Interest Prevention Directive.

Unless otherwise stated herein, definitions used in the Corruption and Conflicts of Interest Prevention Directive shall have the corresponding meaning in this Country Annex.

Corruption and Conflicts of Interest Prevention Directive

A Bribery & Granting or Receiving of Improper Advantages

Section A iv. What do we mean by public official?

In addition to the definition found under section A iv., the following shall apply in Sweden.

The term “public official” includes the following categories of persons:

1. Any person who *exercises public authority or decides on public procurement*.

For the purpose of this Country Annex “exercising public authority” means decisions or other measures by public authorities based on law and that are binding on individuals and associations. Typical examples include activities carried out by government, parliament, county administrative boards, courts, prosecutors, police and social municipal boards.

For the purpose of this policy “public procurement” means measures under Lag (2016:1145) om offentlig upphandling and other from time to time applicable public procurement acts, taken by public authorities and certain other organizations financed by public funds.

2. Any employee of or contractor at *public entities*, even if the employee or contractor does not participate in the exercise of public authority or decides on public procurement.

For the purpose of this Country Annex “public entities” means state and municipal authorities, boards and agencies irrespective of whether or not they exercise public authority.

3. Any employee or contractor within sectors where integrity is particularly sensitive and in which interests must be protected such as in publicly owned or financed companies, privately owned banks and credit and insurance institutes, which

manage funds entrusted by the general public, as well as companies involved in certifying or monitoring activities.

D Gifts and Invitations

Section D iv. Gifts and invitations in the private sector

In addition to the list of conditions set out in section D iv., the following general principles shall always be considered:

1. Has the gift/invitation been made overtly? - i.e. has the gift/invitation been directed to the other company and not to specific individuals? Has it been approved by the other company? Does the gift/invitation comply with established policies on receiving/giving gifts/invitations.
2. Is the gift/invitation moderate? – i.e. taking into consideration for example the financial or sentimental value of the gift/invitation, the business sector to which the company belong, the background (age, position, experience etc.) of the receiver and the giver, applicable customs and practices etc.
3. Is the gift/invitation of a nature which cannot be deemed to influence behavior?

If the above general principles are fulfilled then the gift/invitation is generally permissible unless the Corruption and Conflicts of Interest Prevention Directive specifically states otherwise.

Section D v. Gifts and invitations in the public sector

In addition to the list of conditions set out in section D v. and the examples set out in the Attachment: Gifts and Invitations, the following shall apply.

It is strictly forbidden to provide, promise or offer any gifts, reward or the like to a public official falling under category 1 as described above under section A v., i.e. any person who *exercises public authority or decides on public procurement*.

In respect of public officials falling under category 2 and 3 as described above under section A iv., the conditions listed in section D v. apply. In addition, the following general principles shall always be considered:

1. The value of the gift/invitation – The higher the financial or sentimental value of the gift/invitation, the higher is the risk of influencing behavior.
2. The position of the recipient – The closer a person works with a person who exercises public authority or decides on public procurement the higher is the risk that a gift/invitation is deemed improper (e.g. administrative or services staff at a public entity).
3. The nature of the gift/invitation - The risk that a gift/invitation is to be deemed improper increases the weaker the link is to the work tasks of the recipient.