

# STENA METALL GROUP ANTI-CORRUPTION POLICY (ENG)

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The purpose of this policy is to provide a framework for anti-corruption. By anti-corruption we mean the prevention of all forms of corruption, including bribery, conflicts of interest and money laundering. Stena Metall works in a manner that contributes to substantially reducing corruption and bribery in all its forms. We do not sanction or tolerate corruption in any form or context, directly or indirectly, through offering, promising, requesting, soliciting or accepting bribery or improper benefits.

No sectors or organizations in any market are immune from the possibility that bribery and corruption risks can occur. Corruption is not merely a legal issue. It causes costs, hampers competitiveness, innovation, and jeopardizes the credibility of our company and our people at large. Having a transparent and ethical culture to safeguards our corporate integrity contributes strongly to our ability to run a sustainable business.

## **At Stena Metall:**

- We believe that by having adequate, effective procedures and measures in place, corruption can be prevented and eradicated.
- Ethical, incorruptible and thus trustworthy conduct is a fundamental part of our business acumen.
- We promote transparency within our own organization, in the collaboration with business associates and across supply chains through which we work.
- We expect employees and business associates to act ethically and transparently so that bribery and corruption risks can be identified, avoided and lessons can be learnt and knowledge shared.
- Our operations and business decisions should never be subjected to conflicts of interest. Private interests of individual employees or business associates shall not be allowed to influence or seem to influence their judgement or behavior.
- All employees shall have the right and ability to anonymously report suspicions of corruption without the fear or risk of retaliation or discrimination.

Companies within the Stena Metall AB group shall have measures to prevent, detect and manage potential risks and acts of corruption. The strategy for this shall be a part of the group's management system, including actions to address risks and opportunities, support, operations, performance evaluation and continuous improvements in relation to anti-corruption. The effects of the policy and associated work shall be reported and reviewed periodically and in conjunction with other business management processes.

Requirements set forth in Stena Metall's anti-corruption policy apply to all our employees and business associates. All new employees including business associates are expected to commit in writing to the policy and Stena Metall's Code of Conduct upon employment or contracting. All employees will receive relevant training to be able to work in accordance with the policy and Code of Conduct and are encouraged to keep themselves up-to-date to ensure adequate awareness. We also recommend our business associates to similarly provide relevant training to their organizations.

For employees, any questions or concerns regarding this policy can be directed to your immediate supervisor or the HR department. Employees are encouraged to report any suspicion of potential corruption to their immediate supervisor. Should this be deemed inappropriate, he/she can report to Stena Metall's corporate HR-manager, or as a final measure, use Stena Metall's whistle-blowing function. Any form of retaliation is prohibited, and Stena Metall will terminate employment or contract with immediate effect in case of breach of this policy or the Code of Conduct.