

Anti-Bribery and Corruption

Fairford Holdings Europe AB, our owners, has in place a **Anti Bribery & Corruption – Group Policy** (published March 2016), that we in AP&T comply to. If you need a copy, ask AP&T CSR responsible.

This document

We believe that long term success in business is only possible where there is free and fair competition. Based on this fundamental principle and our legal obligation it is the policy of AP&T and subsidiaries to conduct our business in an honest and ethical manner. We take a zero- tolerance approach to bribery and corruption and are committed to acting with integrity in our business dealings wherever we operate.

We will uphold all laws relevant to countering bribery and corruption. Bribery and corruption are criminal offences that are punishable for individuals by fines and/or imprisonment. If we, as a company, are found to have taken part in corruption we could face an unlimited fine and face damage to our reputation. We therefore take our legal responsibilities very seriously.

The overall objective of this policy, and the related procedures, is to protect any officer, director, agent, employee, or person performing services for our company, or in its name, from giving or receiving bribes, to prevent corruption in all activities under the Group's control

There are geographical differences around the globe with regional or local business behaviour which generally is considered as normal market practise/normal business behaviour in its respective markets. Should we face situations in such regional/local markets where there are no clear rules or principles to apply, such situations shall be separately evaluated and documented.

The Group's anti-bribery and corruption programme is an on-going process which is likely to be adapted over time.

Conflicts of interest

We assure that private interests do not interfere with the interests of our Group. A Conflict of Interest arises when an employee's private interest interferes or "conflicts" with his or her duties as a AP&T employee. The AP&T Group acknowledges and respects its employees' private interests and activities. However, the AP&T Group expects undivided loyalty from all its employees. Employees may not engage in activities which could conflict with AP&T Group's business and could interfere with the employee's assigned job responsibilities, which always must be performed in AP&T's best interests. Employees may not use their position within AP&T, or AP&T's information or assets, for personal gain or to improperly benefit others.

To avoid risks associated with Conflicts of Interest, including the appearance of a Conflict of Interest, AP&T Group employees are required to disclose any real or potential Conflict of Interest to their supervisor which will address and resolve the conflict as necessary.

Who is covered by this policy?

This policy applies to all individuals working for the Group, or any of our subsidiaries, at all levels and grades, whether permanent or temporary, including board members, consultants, contractors, trainees, or any other person associated with us wherever located.

In this policy, "Business Partner" means any individual or organisation that is not directly employed by the Group, but perform certain activities connected to the Group or on behalf of the Group through contractual arrangements, like for example customers, suppliers, agents and retailers.

What is Bribery?

Bribery is the act of giving anything that the recipient may deem as of value in exchange for an alteration of their behaviour (to the benefit/interest of the giver) that the recipient would otherwise not alter.

A Bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. See appendix 2 and 3 below for FAQ, common questions and case.

Bribery is strictly prohibited

You are not permitted to offer, promise, give, accept or solicit Bribes (directly or indirectly, including through Business Partners). Funds or assets of the Group or from any other source may not be used to give any Bribe.

Consequences of non-compliance

Your failure to comply with this Policy can lead to disciplinary action (up to and including termination of your employment or other contractual relationship with the Group) as well as possible civil or criminal penalties such as fines and/or imprisonment. Failure to comply with this Policy by a Business Partner may result in the termination of its contractual relationship with the Group.

You will not suffer any adverse consequences for refusing to engage in Bribery, even if such refusal may result in the Group losing business. If there is any doubt about whether an activity is permitted, you should consult the AP&T CSR responsible.

Gifts and Hospitality

Giving, receiving gifts and hospitality, including enjoying meals or other leisure activities with business contacts, must be within AP&T group and country specific rules and regulations. Lavish gifts or hospitality may be used to influence, bribe or manipulate, and can give rise to criminal liability. Any gifts must be received or given transparently and must be recorded.

The Group prohibits any giving or receiving of gifts or hospitality and the paying of expenses where it might be perceived to influence a business decision. Gifts of cash or cash equivalents (e.g., gift certificates, loans, stock, stock options) shall never be given or accepted.

Donations and Sponsorships

Charitable donations and sponsorships must not be contrary to applicable laws or used for the purpose of obtaining or retaining business for the Group or influencing a business decision. For a charitable donation or sponsorship on behalf of the Group, you must obtain the prior written approval from the CEO.

Political Contributions

The making of any political contribution of any sort with any of the Group's funds or assets, or on behalf of or as a representative of the Group, is strictly prohibited. If you receive a request for a political contribution from any person, you shall report it to the CEO or Local MD at the earliest opportunity. A political contribution includes any benefits to a political party, candidate for any political party, or member of any "think tank" close to a political party.

Facilitation Payments

A Facilitation Payment is an unofficial and unauthorised payment which is made to secure or expedite a government action (or inaction). These payments are Bribes and are illegal. If you have doubts about a payment and suspect that it may be a Facilitation Payment, you should report to the CEO.

[If a demand for a Facilitation Payment is accompanied by an imminent threat to your life or liberty, then safety comes first. You can make the payment and report it immediately to the CEO. Any such payment must be recorded properly as a payment made under duress.]

Records

No false or misleading entries should be made in the Group's records for any reason. All transactions shall be recorded in accordance with the Group's policies and procedures and any other relevant financial regulations and legislation.

You must comply with the following requirements:

- All contracts must accurately describe the agreements and transactions in writing, and complete copies must be retained in the Group's records.
- All payments must have adequate supporting documentation. No payment should be made into anonymous bank accounts. Accounts shall be in the name of the payee or of an entity known to be controlled by the payee.

Payments must not be made in cash (except for normal cash payroll payments and disbursements from petty cash supported by signed receipts).

Risk Assessment

Risk assessments shall be carried out on a regular basis in order to identify and prioritize the risks of corruption that the Group may face both in relation to specific countries and in relation to specific Business Partners. The risk assessments and the conclusions shall be documented

Due Diligence of Business Partners

In order to identify and prevent bribery risks, documented due diligence shall be carried out on Business Partners. The procedures shall be proportionate to the risks identified. If the relationship lasts for a long time or if there are changes in circumstances repeated due diligence may be necessary.

Business Partners shall be made aware of this Policy. In certain circumstances Business Partners shall be required to give anti-bribery warranties and similar consents.

Seeking Guidance

While working for the Group, you may encounter a difficult compliance situation. Good judgement, in combination with the Group's policies and procedures, may be sufficient to guide you to the right decision. However, if you have any doubts whether a certain course of action is correct, you should contact the AP&T CSR responsible before proceeding with any transaction.

Reporting Violations

If you have suspicions that any Bribery which may be related to the Group has occurred or is occurring, or if you yourself have been the target of a Bribe or a victim of extortion and you wish to make a confidential report, you shall report the facts in accordance with the AP&T Policy Whistleblowing.

Updates

On an annual basis shall AP&T:

- review this Policy.
- certify to the Board that the Group is following this Policy; and
- identify any exceptions and/or violations of this Policy; and
- ensure that all relevant persons receive necessary training.

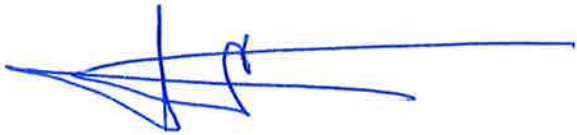
Detailed records should be kept of all the above, such that, if required, they can be made available for inspection by investigators or regulators.

Gifts and Hospitality limits in AP&T*

For values that has been agreed by our CEO, each country should use equivalent, see appendix 1 below

Be aware that repeated hospitality of gifts within the limit can also be considered a bribe (dinner every day with the same customer.)

Company gifts should be bought from our gift shop.



Magnus Baarman
CEO

2022 07 07

Appendix 1 Gifts and Hospitality

Limits dealing with customers in AP&T*

Giveaways to individual with company logo

700 SEK/person (convert to your local currency)

Giveaways company to company

6500 SEK/company

Food baskets/cake/wine or similar

350 SEK/person

Dinner (including leisure activities)

700 SEK/person

Lunch/Breakfast

250 SEK/person

Sport events

Not allowed if value exceeds 700 SEK/person

Customer travels/accommodation

Customer pays travels/accommodation himself, and we pay our own travels

Limits dealing with suppliers in AP&T*

Giveaways to individual with company logo

100 SEK/person

Giveaways company to company

1000 SEK/company

Personal food baskets/cake/wine or similar

Not allowed

Dinner in connection with business meeting

500 SEK/person

Lunch/Breakfast in connection with business meeting

250 SEK/person

Sport events and leisure activities

Not allowed

Travels/accommodation

Supplier pays travels/accommodation himself, and AP&T pay our own travels

**If local employee handbook has lower amounts then these local amounts are to be used*

Appendix 2 FAQ

Q: Can we do business with companies that have been involved in bribery or corruption.

For example it is well known that VW is corrupt in the matter of the exhaust emissions.

A: It is possible to do business with companies that have a history of corruption if AP&T employees behave in accordance with the AP&T ABC policy.

Q: How to deal with booking a hotel for a customer with AP&T rate. Or receiving the offer that another company books a hotel room for you so that AP&T have a cheaper room.

A: It is allowed when it is offered to all partners and do not favour one partner over another.

Q: If we receive a big piece of steel for free from one of our suppliers for development projects and in return, they can have a booth for free at the inauguration. How to we handle this with respect to the ABC policy? Ok?

A: It is ok, this is normal business in development projects.

Q: Is it ok to buy products for other AP&T employees from AP&T supplier. For example, electricity supplies to employee who renovate his house?

A: Not ok, there will be a private dependence between supplier and buyer which might have a negative impact on AP&T. There is a high risk that this will be done during working hours, which is not allowed. Do not mix AP&Ts business relations with private activities.

Q: Is it OK to buy products for themselves from AP&T supplier. E.g., electricity supplies for their own house renovation? Or a hydraulic hose to its private tractor.

A: Not ok there will be a private dependence between supplier and buyer which might have a negative

impact on AP&T. If I do not get a private discount, I'll make sure we change supplier (this risk shall be eliminated exist).

It is ok, to take advantage of a discount that AP&T has centrally negotiated and communicated that all AP&T employees have access to the discount. All such private procurement takes place outside of working hours.

Q: Is it ok to hire relatives.

A: It's not allowed to hire some as a reciprocate to another company or person. All recruitments should follow our normal procedures using our HR department. Hiring relatives is not forbidden if they meet all requirements and with approval according to grandfather's principle i.e., two management levels up in the hierarchy. Functional managers get approval from the CEO.

Q: Is it ok to accept kickbacks from suppliers to employees, e.g., frequent flyer bonus and other loyalty programs.

A: Loyalty points, etc. shall be used for business travels and not for private use if the points have been earned traveling for AP&T. Otherwise, it becomes a taxable benefit.

<https://www.skatteverket.se/privat/skatter/arbeteochinkomst/formaner/rabatterochlan.4.7459477810df5bccdd4800014876.html>

Q: Is it allowed to receive a sandwich cake, chocolate box, Easter egg etc. sent to AP&T for Christmas or Easter?

A: Company to company gift from a supplier is allowed within the cost limit. All gifts should be recorded.

Q: Should an offer for a golf activity be reported as being offered a bribe.

A: No not needed, but we should inform the supplier regarding our ABC policy that sport and leisure activities is not allowed.

Q: Is it ok that the supplier pays accommodation, transport or meals.

A: Travel and accommodation should always be paid by AP&T. Dinner, Lunch and breakfast within set cost limits. Be aware that repeated hospitality within the limit can also be considered a bribe.

Q: Is it possible to deviate from the ABC policy.

A: Deviations from the ABC policy shall in advance be approved according to the grandfather's principle i.e., two management levels up in the hierarchy. Functional managers get approval from the CEO. Deviations shall be documented.

Q: Is it ok, within a day / one shorter visit give a gift of 700 SEK, offer lunch, a more expensive dinner 500-700 SEK, and ending with ice hockey?

A1 (Customer relation): No, that's not ok. Skip the gift of 700 SEK, and make sure that hockey and accompanying dinner is below 700 SEK.

A2 (supplier relation): No, that's not okay. Refrain from ice hockey and the gift. Only lunch or dinner is allowed.

Q: After a long business relationship or other long-term cooperation, you will receive personal contact with the customer's representative and family. You invite home (private money) your new friends for dinner consisting of both food and drink. Even the reverse begins to occur. Is it OK?

A: It's not okay if both parties are part of an ongoing business deal, otherwise you can make new friends through the work.

Q: Is there any limitation in the number of customer representatives or the number of participants from AP&T. Could be activities with customer and supplier.

A: Generally, AP&T should not be represented by more than the business requires. (Check with your manager). If the customer or business partner is represented by a single person, the possibility of AP&T being represented by two is not ruled out.

Appendix 3 Cases

Private travel arrangements

Customer invited AP&T Sales rep to join on flight to Sweden to visit AP&T.

You should avoid travelling together not to have the expectation that the customer would like to have anything in return

Travel and Accommodation

We have invited 70 guest for the BBQ inauguration and one guest ask if we can pay his travel and accommodation, and taxi from airport?

No, we don't pay customers travel and accommodation

Payment for external service

In hard negotiations with Chinese customer about a bank guarantee, customer ask us to pay 500USD for us to get the guarantee. We have never done this before and it should be paid to a specific bank account. We will get an invoice specifying the fee is for "External Services". What should we do?

This should not be done without further investigation on why we need to pay this amount, and where the money goes.

Use of agents

We don't have contract with agent and we don't know how the business is done

Follow the risk assessment procedures

Customer visit

Customer comes to office at afternoon. After work we go for dinner at 700SEK/pers. After dinner comes a suggestion to continue at karaoke or bar at estimated cost of 500SEK/pers

Tell customer about our policy and say no thanks

Entertainment using own money

We inform customer that we have an ABC policy and then go for dinner. After dinner customer wants to continue. Its important to build relationship and I feel forced to take money out of my own pocket as budget is already reached. How to act?

Politely refuse as limit is reached

Oversea visitor

Our customer visits us from far away and stays over the weekend. We want to build relationship with customer and wonder if we can bring customer for a weekend activity?

Yes, if max 700/SEK per person

Speed up customs clearance

Its common, and everybody does it, to always pay customs "under table" money in order to speed up the clearance quicker than others. What should we do?

This is facilitation payment and not allowed. Need find other ways around this

Sharing presentations at conference

AP&T pays for a conference and exclusively get all presentations from the presenters. A customer, partner, ask us to share it with them even though the policy for the conference says that it is not allowed to share. AP&T still shares information with third party and in return ask for high value information. Is this ok?

No, we should live by high standards and as we have said it is not allowed to share, we don't, as our reputation will be bad if found out.