

Date: Thursday, April 12, 2018

## Introduction

All operations at Powerbox are performed with high ethical standards. Corruption is the abuse of entrusted power for private or business gain, and is associated with giving and taking of bribes. Powerbox does not accept any form of corruption. This policy applies to all employees as well as business partners that act on behalf of the Company.

- Applicable anti-bribery laws are strictly followed.
- Employees at Powerbox are strictly forbidden to directly or indirectly offer, promise, grant, or authorize the giving of money or anything of value to someone in order to unduly influence the recipient in the performance of professional duties, or in order to obtain or retain an improper advantage.
- The same applies to receiving benefits. It is forbidden for anyone acting on behalf of the Company to accept, accept a promise of, or request an improper benefit for the performance of professional duties.
- Benefits given to those working in the public sector are more likely to be considered improper and illegal than benefits given to those working in the private sector. For this reason, extra care must be taken when interacting with representatives of the public sector.

## Definition of a bribe

- An improper benefit or bribe may take different forms - gifts, entertainment, or invitations to events or seminars; travel and accommodation; use of property or equipment; job offers or work placements; charitable or political donations; or services, favours, or benefits for family or friends.
- The nature and value of the benefit and the professional duties of the persons involved are taken into account when assessing whether the benefit can be deemed improper.

## Hospitality and gifts

- Hospitality in the form of lunch or dinner is allowed provided that the expenditure is reasonable. Wine, beer, and spirits are allowed as table drink, but in moderation. The same standards apply as when offering and accepting hospitality.
- Gifts are allowed in the form of reasonable business expenditures related to company promotions. For example, promotional products are acceptable when offered in connection with a corporate event or company visit.
- Employees are allowed to accept promotional products and samples in moderation. Employees may accept reasonably priced gifts on appropriate occasions, corresponding to a price of 500 SEK (Swedish Crown) or below. Exceptions for gifts exceeding this limit can only be made with the approval of the CFO. When possible, accepted gifts are to be distributed among a larger group of employees.

**Corporate Events**

- Corporate events, such as seminars or courses organized or attended by anyone acting on behalf of the Company, must have a legitimate business purpose.

**Violation of the Policy**

- Employees who violate anti-bribery laws or this policy may be subject to disciplinary action by the Company, up to and including termination of employment.
- No employee who, after consultation with appropriate personnel at the Company, refrains from entering into a transaction because of concerns regarding anti-bribery laws will be adversely affected as a result.

**Reporting**

Employees who suspect that a violation of anti-bribery law has occurred at the Company are required to report this to the CFO or through the Company whistleblowing channel.

**Training**

The Company provides adequate training for all employees consistent with the Company's risk profile and appropriate to employee responsibilities.

POWERBOX INTERNATIONAL AB



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