

Anti-corruption Policy for BIM Kemi

1. Introduction

Corruption is defined as the misuse of entrusted power for private gain.

This definition corresponds to the concept of corruption in the Swedish Penal Code and in international anti-corruption conventions, and it covers situations involving the taking and giving of bribes as well as other types of active or passive corruption.

Corruption is best known in the form of bribery, fraud, embezzlement or extortion. However, corruption does not exclusively involve money changing hands; it may also include providing services to gain advantages, such as favourable treatment, special protection, extra services or quicker case processing.

The Swedish Penal also prohibits to receive, accept a promise of or request an improper benefit in order to influence a person who exercises public authority or decides on public procurements, or to provide, promise or offer an improper benefit in order for the recipient to influence the decision maker when exercising public authority or deciding on a public procurement (*trading in influence*).

2. Our policy

BIM Kemi is committed to conducting business in an ethical and honest manner. BIM Kemi's overall policy on anti-corruption is that it will fight corruption in all its forms, including bribery, facilitation payments, trading in influence and extortion.

BIM Kemi complies with all relevant laws, including anti-corruption laws. Bribery is punishable under the Swedish Criminal Code, and in the markets in which BIM Kemi operates. Thus, a violation of this policy poses a significant business risk. A violation of this policy will also be a breach of our company values as well as our commitment to the UN Global Compact.

This policy covers all of BIM Kemi's employees as well as anyone acting on behalf of BIM Kemi such as agents and business partners.

Any arrangements BIM Kemi makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to corruption and anti-bribery.

3. Bribery, including facilitation payments and kick backs

BIM Kemi will not give or accept bribery in any form.

Bribery is the act of offering, giving (active bribery), receiving, soliciting or accepting (passive bribery) any item of value to influence the actions of an employee. This policy covers both bribery (the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust) and facilitation payments (a small bribe, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.).

Facilitation payment is only allowed to protect life, limb or liberty and must immediately be reported to the closest manager.

BIM does not allow “kickbacks” to be made or accepted. “Kickback” is the offering or acceptance of corrupt payments and other advantages between private (non-government) persons and entities.

4. Nepotism and favouritism

Individual employees of BIM Kemi will not favour friends, family or other close relations in recruitment, procurement, sales, assistance, or other situations.

BIM Kemi is an entrepreneurial family business that intends to support our employees and their families access to job opportunities with BIM Kemi. Consequently, BIM Kemi as a company may favour or treat relatives to employees advantageously, if approved by senior management.

In any other cases, BIM Kemi will not favour or treat family and relatives advantageously due to close personal relations, rather than on the basis of a professional and objective assessment of their abilities and capabilities.

5. Gifts, entertainment and hospitality

Employees at BIM Kemi shall not give, solicit or receive directly or indirectly any gift, entertainment or other favour that may be seen to influence the exercise of their function, performance of duties or judgement.

As a general rule, employees should not receive or give gifts or other benefits in connection with their work. However, BIM Kemi’s way of doing business involves e.g. smaller gifts or acts of hospitality, but it should not be for personal gain or to influence business decisions and it must be at a reasonable level. In the case of doubt, the BIM Kemi employee should always contact the closest manager for advice or have the expenditure approved.

Smaller gifts may be accepted in some cases. These could be in connection with events of a personal nature such as birthdays, anniversaries, resignations or similar. Situations may arise where the receipt of a gift may seem impolite or contrary to local customs or conventions.

Gestures which may be considered remuneration for a task performed, such as a couple of bottles of wine for doing a presentation, are not considered gifts. Neither are benefits granted internally at the workplace, such as donations for a staff party, small gifts during the holiday season and events of a personal nature.

In case of hospitality or entertainment, BIM Kemi accepts that its business relations pay for BIM Kemi’s employees’ costs, if the purpose of the event is predominantly business relevant. Any hospitality or entertainment not predominantly business relevant is paid by BIM Kemi if approved by the closest manager. BIM Kemi does not pay for business partners’ costs, if the purpose of the event is not predominantly business relevant.

6. Donations, sponsorships and political contributions

BIM Kemi does not provide contributions to any political party, and exercise due diligence when donating or sponsoring organisations and events.

Donations and sponsorships are cash or something of value donated by BIM Kemi to an organisation, event or cause. In some situations, this can constitute a corruption risk, and thus, due diligence must be exercised (i.e. by ensuring that donations are given to trustworthy, well known organisations).

Any donation or sponsorship must be approved according to BIM Kemi policy on donations and sponsorships.

7. Conflicts of interest

We will avoid any conflict – real or potential – between our personal interests and the interests of BIM Kemi.

Conflicts of interest arise in situations where an employee has a private interest that may potentially affect or seem to affect the impartial and objective performance of the employee's duties. Private interests cover personal gain and gains or benefits for family, relatives, friends and persons or organisations to whom there is or has been a commercial or other affiliation.

8. Reporting a concern

If you suspect that there is an instance of violation of the policy, you are encouraged to raise your concerns at as early a stage as possible with your closest manager or using our reporting mechanism. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your closest manager.

9. Implementation of the policy

BIM Kemi will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

The policy will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

The effectiveness of this policy and its implementation will be reviewed by group management on a yearly basis.