



SAAB



**GIFTS, EVENTS
AND HOSPITALITY**
GUIDING PRINCIPLES

INTRODUCTION

This document summarizes the key principles set out in Saab's policy on gifts, events and hospitality (DIR-C-196 Gifts, Events and Hospitality).

Gifts, events and hospitality (G&H) can be an acceptable form of promoting a company's products and services, improving the image of a company and of expressing appreciation in connection with important business events.

However, improper or excessive G&H can be a form of bribery or corruption and thereby expose Saab and its employees to criminal charges and civil actions. Therefore, it must always be carefully assessed whether a particular G&H is reasonable and appropriate under the circumstances.

What kind of G&H is acceptable?

Saab only offers and pays for G&H which is reasonable, proportionate and given for the right reason, i.e.

- is offered for improving the image of Saab, to better present Saab's products and services or to establish cordial relations, and
- is moderate in value and proportionate to the purpose, and
- is generally seen as proper, decent and ethical.

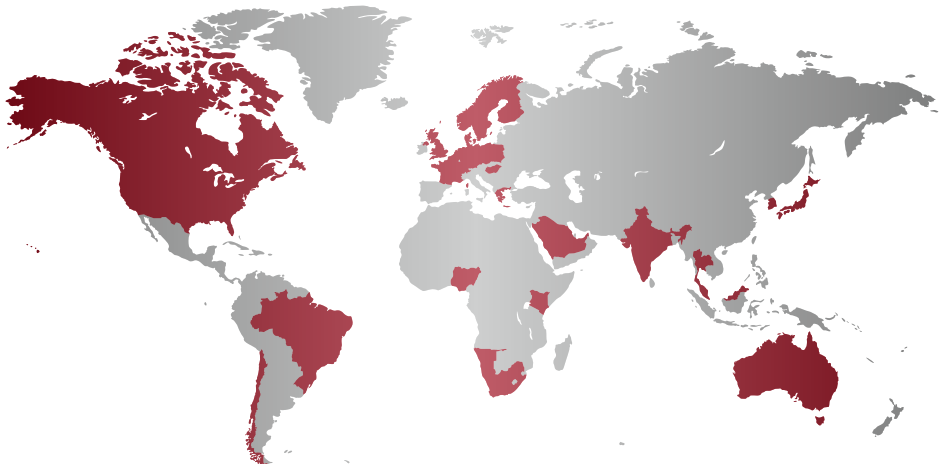
- is excessive in value or is unethical in nature, or
- is offered to induce a person to act improperly, or
- is offered in conflict with local laws or despite information that the recipient otherwise is not permitted to accept the G&H.

In addition, G&H must never be offered in the form of cash or other payments, pleasure trips or side deliveries of products or services from Saab, or any other similar personal benefit arising from a contract placed at Saab.

What kind of G&H is never acceptable?

Saab never offers or pays for G&H which is unreasonable, disproportionate or given for obtaining improper advantages, i.e.

- is offered without a relevant connection to Saab's activities, or
- is repeatedly extended to the same person, or





G&H in relation to public officials

Saab's business activities are largely oriented towards governmental procurement organizations and users within nations' armed forces. From this follows a special responsibility to act properly to avoid any suspicion that the company is attempting to influence a public decision by improper means. G&H to public officials must therefore be handled with special precaution and restraint.

G&H when business negotiations are ongoing

If business negotiations are ongoing, special precaution is also called for regardless of whether the other party represents a public organization or whether it is a business-to-business matter. Where an individual holds a decision-making position in an ongoing procurement process or is involved in the preparation or evaluation of such process, G&H which otherwise would be reasonable may become improper.

Transparency and accounting

Irrespective of form, G&H shall always be handled in an open and transparent way and expenses incurred for G&H shall be properly recorded, such that they are easily available for review and audit.

Saab employees as recipients of G&H

Saab employees are required to act impartially in the management of their duties and to avoid the risk of being affected by irrelevant considerations. Therefore, the restrictions and precautions relating to the giving and offering of G&H apply also for Saab employees as recipients of G&H.

Whenever a Saab employee is offered G&H which is of a value, nature or offered under circumstances that may be in conflict with Saab's G&H policy, this shall be reported to a superior level or to Group Legal Affairs for decision whether the G&H is appropriate. Anyone reporting G&H this way shall not be held in breach of Saab's G&H policy.

Occasionally Saab employees may receive gifts in connection with signing ceremonies and similar events, which are obviously not consistent with Saab's G&H policy. In such case and if cultural or similar reasons make it impossible to reject the gift, it must without delay be handed over to Group Legal Affairs, who shall decide how to dispose of the item.

Seek advice

Any one confronted with a situation where a particular G&H due to its value or nature may be in conflict with Saab's policy should raise the concerns with his or her superior, or seek advice from Group Legal Affairs.



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Further information:

Saab Code of Conduct

DIR-C-200 Management and Prevention of Corruption Risks

DIR-C-196 Gifts, Events and Hospitality

All available on the Business Ethic section on Saabnet

Support:

Group Legal Affairs

Ethics and Compliance

Market Network Management