

## Byggfakta Group Anti-corruption and Bribery Policy

### 1. Introduction

Byggfakta Group is committed to the highest standards of ethical conduct and integrity in its business activities in all regions in which we operate. This policy outlines Byggfakta Group's position on preventing and prohibiting bribery. Byggfakta Group will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

### 2. Scope

This policy applies to all employees of Byggfakta Group, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, Byggfakta Group ("associated persons") in all regions in which we operate. Every employee and associated person acting for, or on behalf of, Byggfakta Group is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute disciplinary action (or in the case of an associated person, termination of their contract) and potentially criminal action for the individual concerned in addition to the potentially serious reputational damage to Byggfakta Group.

Byggfakta Group may also face criminal liability for unlawful actions taken by its employees or associated persons under relevant regional laws and regulations. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time.

#### This policy covers:

The main areas of liability in relation to Anti-bribery and Corruption; The responsibilities of employees and associated persons acting for, or on behalf of, Byggfakta Group; And the consequences of any breaches of this policy.

### The Policy

Byggfakta Group is committed to complying with relevant laws and regulations in all regions in which we operate.

A bribe is deemed as a financial or other type of advantage that is offered or requested with the intention of inducing or rewarding improper performance of a function or activity; or knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another Company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed if:

an employee or associated person acting for, or on behalf of, Byggfakta Group offers, promises, gives, requests, receives or agrees to receive bribes; or an employee or associated person acting for,

or on behalf of, Byggfakta Group offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence); and

Byggfakta Group does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy.

### 3. What is prohibited?

Byggfakta Group prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe.

The bribe might be cash, a gift or other inducement to, or from, any person or Company, whether a public or government official, official of a state-controlled industry, political party or a private person or Company, irrespective of their location.

The bribe might be made to ensure that a person or Company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for Byggfakta Group in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

It is not acceptable for employees or associated persons (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- accept a payment, gift or hospitality from a third party that they know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
- accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
- offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of [the Compliance Manager];
- threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or engage in any other activity that might lead to a breach of this policy.

### 4. Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that all Company records are accurately maintained in relation to any contracts or business

activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative, in accordance with Byggfakta Group's procurement and risk management procedures.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

## 5. International Conduct

Employees and associated persons conducting business on behalf of Byggfakta Group in regions where no or minimal anti-corruption and bribery laws or regulations are in place, may be at greater risk of being exposed to bribery or unethical business conduct. Employees and associated persons owe a duty to Byggfakta Group to be extra vigilant when conducting international business in those regions.

### Procedure:

Employees and associated persons are required to cooperate with Byggfakta Group's risk management procedures and to report suspicions of bribery as soon as possible to the Compliance Manager. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- close family, personal or business ties that a prospective agent, representative or joint venture partner may have with government or corporate officials, directors or employees;
- a history of corruption in the country in which the business is being undertaken;
- requests for cash payments;
- requests for unusual payment arrangements, for example via a third party;
- requests for reimbursements of unsubstantiated or unusual expenses; or
- a lack of standard invoices and proper financial practices; or
- if you become aware that a third party engages in, or has been accused of engaging in, improper business practices or has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials; or
- a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business; or
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services or requests that you provide employment or some other advantage to a friend or relative; or
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- you are offered an unusually generous gift or offered lavish hospitality by a third party. If an employee or associated person is in any doubt as to whether or not a potential act constitutes bribery, the matter should be referred as soon as possible to the Compliance Manager.

## 6. Facilitation payments

Byggfakta Group prohibits its employees or associated persons from making or accepting any facilitation payments or kickbacks. Facilitation payments are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas. Kickbacks are payments made in return for a business favour or advantage.

Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and Byggfakta Group, even where such payments are made or requested overseas.

Employees and associated persons are required to act with greater vigilance when dealing with government procedures overseas.

### Procedure:

Where a public official has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give these, this should be reported immediately to the Compliance Manager.

If the public official provides written details, the Compliance Manager will consider the nature of the payment.

If it is concluded that the payment is a legitimate fee, for example part of a genuine fast-track process, or is permitted locally, Byggfakta Group will authorise the employee to make the payment and an appropriate receipt must be obtained.

Where the Compliance Manager considers that the request is for a facilitation payment, the employee or associated person will be instructed to refuse to make the payment.

Byggfakta Group will seek the assistance of the relevant employee in its investigation and may determine that the matter should be referred to the prosecution authorities.

If an employee or associated person has any other concerns about the nature of a request for payment, he/she should report it to the Compliance Manager as soon as possible using the reporting procedure set out in this policy and in accordance with Byggfakta Group's whistleblowing policy.

## 7. Corporate entertainment, gifts, hospitality and promotional expenditure

Byggfakta Group permits reasonable and appropriate corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of the organisation; or
- to present Byggfakta Group's [goods/services] effectively;

Provided that it is:

- arranged in good faith; and not offered, promised or accepted to secure an advantage for the organisation or any of its employees or associated persons or to influence the impartiality of the recipient.

Byggfakta Group will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

This principle applies to employees and associated persons, whether based in the UK or overseas. However, those with remits overseas will be given further training on the specific procedures that they are required to follow.

#### Procedure:

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to their line manager or director, Byggfakta Group Compliance Manager, or Byggfakta Group Secretary.

Employees are required to set out in writing:

- the objective of the proposed client entertainment or expenditure;
- the identity of those who will be attending;
- Byggfakta Group that they represent; and
- details and rationale of the proposed activity.

Byggfakta Group will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. Byggfakta Group will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example prior to a tendering exercise).

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to the employee's line manager or director, Byggfakta Group Compliance Manager, or Byggfakta Group Secretary. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, of a value not exceeding SEK650, such as flowers or a bottle of wine, may be retained by employees, but must be recorded in the Register of Corporate Hospitality (see Section 4, above).

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the employee's line manager or director, Byggfakta Group Compliance Manager, or Byggfakta Group secretary is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances and will be subject to a cap of SEK650 per recipient.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with Byggfakta Group's expenses policy.

## 8. Charitable and Political Donations

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation may be offered or made without the prior approval of the Compliance Manager or Company Secretary.

## 9. What practices are permitted?

This policy does not prohibit reasonable and appropriate hospitality and entertainment with clients (please see Byggfakta Group's expenses policy); and the use of any recognised fast-track process that is publicly available on payment of a fee. Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.

## 10. Risk Management

Byggfakta Group has established detailed risk management procedures to prevent, detect and prohibit bribery. Byggfakta Group will conduct risk assessments for each of its key business activities on a regular basis and, where relevant, will identify employees or officers of Byggfakta Group who are in positions where they may be exposed to bribery.

### Procedure:

Byggfakta Group will identify high-risk areas, for example projects undertaken in high-risk countries, tenders for work and those working on high-value projects. Employees and associated persons are required to complete a bribery risk assessment form with the Compliance Manager when commencing a new project.

Byggfakta Group will:

- regularly monitor "at risk" employees and associated persons;
- regularly communicate with "at risk" employees and associated persons;
- undertake extensive due diligence of third parties and associated persons; and
- communicate its zero-tolerance approach to bribery to third parties, including actual and prospective customers, suppliers and joint-venture partners.

## 11. Reporting Suspected Bribery

Byggfakta Group depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist Byggfakta Group and to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons are encouraged to report any concerns that they may have to their line manager or director, Byggfakta Group Compliance Manager, or Byggfakta Group secretary as soon as possible.

Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or associated persons may be being bribed; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

### Procedure:

A form is available on the staff intranet here to allow employees to record any incidents of suspected bribery; this may be done anonymously if desired. Any such reports will be thoroughly and promptly investigated by the Compliance Manager in the strictest confidence. Alternatively employees can contact the Compliance Manager directly. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees will also be required to comply with Byggfakta Group's whistleblowing policy.

Employees or associated persons who report genuine concerns of bribery in good faith will be supported by Byggfakta Group. Byggfakta Group will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report.

Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to their line manager or director, Byggfakta Group Compliance Manager, or Byggfakta Group Secretary as felt appropriate.

When an individual reports suspected instances of bribery, Byggfakta Group will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the report of bribery.

Action by Byggfakta Group:

- Byggfakta Group will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out.
- Byggfakta Group will invoke its disciplinary procedures where any employee is suspected of breaching this policy, and proven allegations may result in a finding of gross misconduct and immediate dismissal.
- Byggfakta Group may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, Byggfakta Group who are found to have breached this policy.
- Byggfakta Group may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police.
- Byggfakta Group will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

## 12. Review of procedures and Training

Byggfakta Group will regularly communicate its anti-bribery measures to employees and associated persons. Byggfakta Group will set up training sessions where applicable. Byggfakta Group Compliance Manager is responsible for the implementation of this policy.

The Compliance Manager will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

Employees and those working for, or on behalf of, Byggfakta Group are encouraged to contact the Compliance Manager with any suggestions, comments or feedback that they may have on how these procedures may be improved.

Byggfakta Group reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.