Seamless
Distribution Systems

Global corruption and anti-bribery policy

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1. Purpose of this document

This document is part of the **“Seamless Distribution Systems AB One Global policy”** which covers several administrative and ethical issues and provides practical solutions to employees and regional management. The policy has been developed and approved by the Seamless management committee. These rules and guidelines apply to all direct or indirect employees of Seamless and apply to all regional locations. Seamless takes a **zero-tolerance** stance on policy breaches.

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2. Anti-bribery policy

It is the policy of Seamless Distribution Systems (SDS) to observe the highest standards of ethical conduct and to comply fully with all applicable laws and regulations. The purpose of this policy is to identify the basic requirements and restrictions that such anti-bribery legislation imposes on the company and to outline the company's commitment to adhere to legislation in the conduct of its business activities worldwide.

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3. Scope

a. This policy concerns:
   - Anyone offering, promising or giving anything of value to improperly influence another in order to obtain business for SDS or an advantage for an individual; or
   - Any direct or indirect employee or individual working at any level or grade, including senior managmenet, directors and trainees or interns

b. This policy covers:
   - Bribes
   - Gifts and hospitality
   - Facilitation of any payment
   - Political contributions
   - Charitable contributions without aurthorised permission

c. As per point 1 and 2 if an employee is found to have engaged in corruption or bribery, SDS will take corrective or disciplinary action.
d. Employees may not accept any of the following gifts from business partners/associates:
   - Over $200 in value for each individual gift/hospitality event
   - Any amount of cash
   - A gift with any implied return favor expected by the person giving the gift

If any gift is accepted from the above points it must be reported to the respective regional manager and senior management will report to CEO in written form.
If you feel it is not appropriate to take the gift and unable to decline, the employee can accept and pass on the gift to their regional manager or CEO. It will be donated to charity.

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4. How to raise a concern

You are encouraged to raise concerns or suspicions of malpractice at the earliest possible stage in writing to top management.

Employees who raise concerns or report another's wrongdoing will not face repercussions. We aim to encourage openness and will support anyone who raises concerns in good faith under this policy, even if they turn out to be mistaken.

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5. Special requirements when dealing with public officials or others

“Public officials” include:

- Any official, employee or agent of a government, department or agency; or
- Official employee or agent of a government-owned or controlled entity, business, or instrumentality; or
- A political party or political party official; or
- Candidate for political office; or
- Employee or agent of a public international organization; or
- Anyone acting on behalf of any of these officials; or
- An individual holding a legislative, administrative, or judicial position.

Greater care must be taken in dealings with public officials in any country. In many countries, it is common for governments to own or operate business enterprises, either in whole or in partnership with a private entity. Anti-bribery legislation does not prohibit legitimate business dealings with public officials; however, such relationships must be formed, maintained, and monitored with particular attention to this Policy.

Under no circumstances shall an employee of SDS or a third party offer, promise, authorize, or make an improper payment to, or otherwise confer any illicit benefit upon, a public official in any country, directly or indirectly, to obtain, retain, or direct business to anyone. Moreover, SDS employees and third parties are duty-bound to adhere to ethical business practices that exceed the legal requirements of anti-bribery legislation by exercising prudent judgment and caution at all times to refrain from making any payments or otherwise conferring any benefits on any public official that potentially could create even an appearance of impropriety.

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6. Political contributions

We do not make donations, whether in cash or in-kind in support of any political parties or candidates, as this can be perceived as an attempt to gain improper business advantages.

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7. Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the compliance manager. All charitable contributions should be publicly disclosed.

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8. Your responsibilities

You must ensure that you read, understand, and comply with this policy.

- The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of all those working for us either directly or indirectly.
- All employees are required to avoid any activity that might lead to or suggest a breach of this policy.
- You must notify your manager as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

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9. Record keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts accepted or offered which will be subject to managerial review.

- You must ensure all expense claims relating to hospitality, gifts, or expenses incurred to third parties are submitted following our expenses policy and specifically record the reason for the expenditure.

- All accounts, invoices, memoranda, and other documents or records relating to dealings with third parties, such as clients, suppliers, and business contacts should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

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10. Protection

- Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption or because of reporting in good faith their suspicion that actual or potential bribery or other corruption has taken place, or may take place in the future.
- Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied and you are an employee, you should raise it formally using the company's grievance procedure.

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11. Training and communication

- Training on this policy forms part of the induction process for all new employees.
- All existing employees will receive regular, relevant training on how to implement and adhere to this policy. Also, all employees will be asked to formally accept conformance to this policy on an annual basis.
- Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

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12. Who is responsible for the policy?

- The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- Regional management has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels is responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

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13. Monitoring and review

- Regional management will monitor the effectiveness and review the implementation of this policy regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible.
- Internal control systems and procedures will be subject to regular audits to assure that they are effective in countering bribery and corruption.
- All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the legal council.
- This policy does not form part of any employee's contract of employment and it may be amended at any time.

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