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Standard	Anti-Corruption and Anti-Bribery Policy	Revised date	2025. 01. 01		


Anti-Corruption and Anti-Bribery Policy

Document No.: SWS-B-004

Effective Date: January 1, 2025

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1. Purpose

SWECO Inc. is committed to fostering transparent and ethical management in order to become a trusted partner to a wide range of stakeholders and to enhance customer value. This policy aims to prevent the occurrence of corrupt and bribery-related practices—economic crimes that damage the company's tangible and intangible assets and undermine fair and impartial job performance by employees. It also seeks to promote active compliance by all personnel with ethical and moral standards.

All employees and business partners of SWECO Inc. must fully comply with all applicable laws and regulations when conducting business on behalf of the company. This includes, but is not limited to, the Criminal Act provisions on bribery and breach of duty, the Improper Solicitation and Graft Act, and any other relevant local anti-corruption legislation.

In the event of a conflict between this policy and local laws in the countries where SWECO Inc. operates, the local laws shall take precedence. This policy may be revised and adapted to reflect the legal requirements and industry-specific characteristics of each respective jurisdiction.

2. Scope

This policy applies to all individuals and entities falling under the following categories:

1. SWECO Inc.'s domestic manufacturing and sales subsidiaries
2. SWECO Inc.'s business partners, including suppliers and other affiliated third parties


3. Implementation Guidelines

A. Bribery

No employee or business partner of SWECO Inc. shall offer, promise, give, solicit, or accept any form of illegal or unethical benefit or bribe, whether monetary or non-monetary, to or from stakeholders.

Bribery refers to any benefit offered or received to gain a monetary or non-monetary advantage. This includes, but is not limited to, cash, services, entertainment, gifts, donations, sponsorships, preferential treatment, or undue conveniences.

If it is inappropriate for a SWECO Inc.'s employee or business partner to provide a benefit directly, it is equally prohibited to provide such benefit indirectly through a third party or alternative channel. In particular, even if an act of bribery appears to result in benefit to SWECO Inc., it must not be overlooked under any circumstances.

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B. Improper Solicitation

Improper solicitations between employees and stakeholders, or among internal employees, are strictly prohibited. Employees must not use their position of power or authority to make unjust demands or receive any form of compensation from stakeholders. No one shall encourage or solicit stakeholders to engage in unfair transactions with the company or its partners.

Employees must refrain from conducting business under preferential terms with specific clients or partners. Any requests for undue business conveniences must be clearly declined. If an employee receives an improper solicitation, it must be reported immediately to their supervisor.

C. Gifts and Entertainment

Employees shall not accept souvenirs or gifts exceeding a modest value deemed acceptable by social norms. In the event such items are unavoidably received, they must be reported and appropriate actions shall be taken.

Employees must not publicly announce personal events to stakeholders related to their duties, and any monetary gifts or offerings must remain within customary and socially acceptable limits.

4. Policy Implementation

A. Monitoring

Companies subject to this policy shall establish a reporting system that is accessible to all employees and stakeholders. They must continuously monitor risks related to corruption and bribery, and implement due diligence procedures when necessary.

B. Actions Upon Violation

Organizations governed by this policy must take immediate action in accordance with internal regulations upon identifying any violations. To prevent recurrence, appropriate measures shall be taken, including the disclosure of relevant information using suitable methods.