



# **Selling to E.ON and our procurement procedures**

**in accordance with our Code of Ethics**



E.ON Sverige is part of the German E.ON Group, which is the world's largest privately owned energy group. E.ON Sverige has slightly more than 6,000 employees and one million customers. Sales amount to about SEK 31 billion. E.ON is a complete energy company that generates and supplies electricity, gas and heating, and offers solutions in energy technology and contracting.

The challenges of the energy industry involve balancing the need for competitive energy and reliable energy supply to achieve environmental and climate goals. E.ON wants to contribute to a more sustainable society, while providing our customers with a reliable energy supply at reasonable prices. Our investments increase the energy supply, which in turn contributes to safeguarding the energy supply, while we simultaneously reduce carbon emissions and the impact on our climate.

E.ON's vision is to become the leading global electricity and gas company. E.ON Nordic shall be the customer's first choice in terms of electricity, gas and heating. One of the prerequisites for achieving this goal is professional behavior throughout our operation.

You are holding a brochure about **E.ON's Code of Ethics** and how it affects the relationship between E.ON's external business contacts and employees at E.ON.

The brochure contains tangible examples of what is permitted and not permitted, both from an external perspective and an internal employee perspective.



## **Policy**

E.ON's business relations shall be characterized by high morals and ethics. E.ON's employees and business contacts shall act in accordance with applicable legislation and norms, and comply with E.ON's rules for preventing corruption and bribery.

Violation of these laws, regulations and norms will lead to the immediate termination of business relations. In addition, anyone found guilty of corruption or bribery may be charged and sentenced. E.ON encourages its suppliers to report to E.ON if any E.ON employee requests or in any other manner attempts to obtain benefits that could lead to or create suspicion of corruption.

## **For whom?**

The guidelines pertain to all commercial contacts, for example:

- suppliers
- public employees
- politicians



## What is corruption?

According to the law, anyone receiving or requesting bribes or other inappropriate compensation for the performance of official duties, for themselves or others, is guilty of bribery. Anyone giving, promising or offering a bribe or other inappropriate compensation for the performance of official duties, for themselves or others, is guilty of corruption.

Naturally, this does not include all benefits or offers. A basic rule by which to ascertain whether a benefit or an offer is inappropriate is whether it generates some form of obligation for the donor or the recipient. Neither should it appear as though the donor or recipient expects certain behavior in exchange for the benefit.

Bear in mind that the offer of a bribe itself is already an offence, regardless of whether the recipient accepts the bribe or not. The request of a bribe represents an offence even if the request is immediately declined. Remember also that there are no distinct monetary limits for what may be classified as a bribe. It is always a matter of judgment in each individual case. Accordingly, always treat benefits with caution.

### **The following are examples of what may be regarded as corruption:**

- offering or accepting money or other valuables in a business relationship. Other valuables may include, for example, shares, bonds, expensive objects, cost-free entertainment or expensive dinners.
- accepting other services for private gains for yourself or your relatives.
- freely accepting products from suppliers for private use.
- offering or receiving private loans from suppliers or other business relationships.
- inappropriately favoring suppliers with family members or friends in key positions. If a situation arises in which there is a risk of this happening, the assignment shall be executed by someone else.

**In addition to the above examples of what may constitute corruption, E.ON's employees are also prohibited from doing any of the following:**



- simultaneously being employed by or operating your own company jointly or in close cooperation with a supplier.
- disclosing confidential information to a supplier, such as current price lists and agreements with competitive suppliers.



## **Remember**

Here are a few rules worth remembering as an E.ON supplier or employee:

### **It may be considered corruption when ...**

you want to be hospitable

you want to be generous

you want to be fair

you offer a study or PR trip

you take action to promote sales

### **and a bribe when ...**

you allow yourself to be entertained

you accept a gift or gain

you accept an advantageous loan or discount

you allow a supplier to perform private services for you

you accept a trip

### **and finally...**

if you do not decline or refuse a benefit in time, it may be considered a bribe



## **What is allowed?**

Here are some examples of what you are generally allowed to offer or receive:

### **Meals**

Work-related meals in the form of lunch or dinner at a normal cost are allowed. Wine or beer may be offered in moderate quantities, but not alcohol. High-quality representation meals are allowed if the meal is reasonable in terms of content and choice of restaurant. Wine, beer and alcohol may be offered in moderate amounts. Representation meals may only be offered to or accepted by the same recipient on rare occasions.

### **Gifts of objects**

Gifts of objects within the framework for normal courtesy are allowed, such as complimentary flowers, fruit, chocolate and similar gifts, in connection with holidays, celebrations and illness. The value of a celebratory gift (50<sup>th</sup> birthday present or similar) may normally not exceed SEK 1,200 and the value of Christmas presents and the like may normally not exceed SEK 400. On other occasions than those mentioned above, only gifts consisting of advertising items, product samples or other objects of insignificant value may be offered or received.

### **Training events**

Invitations to training events, conferences and similar events, including transportation, food and accommodation, are allowed on the condition that at least six hours per day are spent on studies/information. In addition, the event shall be modest, the invitee must benefit from the event in his/her work and the invitation shall be addressed to the invitee's manager (employer or client) for approval. The program for the event shall also be well documented.

### **Invitations to cultural or sporting events**

Invitations to sporting events (for example golf games) or cultural events are allowed if the value for the invitee does not exceed SEK 800. Bear in mind that any related expenses, such as food and refreshments, must be included in the SEK 800. If the value exceeds SEK 800, the invitation must be addressed to the recipient's manager (employer or client) for approval.

**If you have any doubts, contact E.ON's Compliance Officer for advice.**



## **We place demands**

E.ON has affiliated itself to the UN Global Compact. The Global Compact is an organization of responsible companies that enable the business community to be part of the solution to globalization challenges and contribute to creating a more sustainable economy that does not marginalize certain social groups.

### **The Global Compact's principles entail that companies shall:**

- respect international human rights
- ensure that they are not involved in human rights violations
- maintain freedom of association and recognize the right to collective negotiations
- eliminate all forms of forced labor, child labor and discrimination at workplaces
- support a larger environmental awareness and the development of environmentally friendly technology
- work against all forms of corruption, including extortion and bribes

E.ON's standard demands on its suppliers comply with the principles of the Global Compact. **However, E.ON goes further. We want our suppliers in turn to place the same demands on their sub-suppliers.**





## **Disciplinary action**

### **E.ON employees**

If you as an employee violate E.ON's regulations as described in this document in brief, this may result in disciplinary action or labor sanctions in accordance with applicable legislation and agreements.

Should you as an employee encounter or become suspicious of behavior that may indicate corruption or other offences pursuant to the aforementioned information, contact E.ON's Compliance Officer. All information will be treated confidentially and the person reporting the irregularities and suspicions will remain anonymous. An anonymous report can also be made through E.ON's Whistleblower Program.

### **E.ON suppliers**

Violation of E.ON's regulations pertaining to the prevention of corruption may lead to termination of agreements and business contacts and possibly result in legal action.

If you as supplier experience problems that may indicate corruption, we request that you contact E.ON's Compliance Officer. All matters will be handled confidentially.