

Anti-corruption policy

1. Introduction and purpose

SEK will finance the Swedish export industry on commercial and sustainable terms, and act in such a manner as to retain the confidence of our operating environment.

Corruption is a form of abuse of power when someone acquires improper assets via their position. The term “corruption” includes phenomena such as bribery, blackmail, favoritism, nepotism, fraud, embezzlement and conflict of interest. Bribery pertains to accepting and offering benefits.

This policy aims to provide guidelines in efforts to combat corruption and applies to everyone who, in any capacity, represents SEK. SEK only has relationships with parties that are transparent and work to prevent corruption.

2. Organization and responsibility

The Board of Directors is responsible for ensuring a clear position against corruption and compliance in preventing and detecting corruption.

The CEO is responsible for ensuring that sufficient resources and expertise are in place for SEK to prevent and discover corruption as well as follow up on anti-corruption work by analyzing the risks of corruption, preparing internal rules, carrying out training and communication, ensuring that systems to report the suspicion of corruption are provided and that tools are in place for control and monitoring.

All managers have an obligation to ensure that the operation for which they are responsible is conducted with good internal governance and control.

All managers in SEK have a responsibility to follow the policy against corruption and to ensure that anti-corruption work is complied with in daily activities.

3. Position

SEK does not accept that anyone in SEK, or anyone who represents SEK in any capacity, is involved in any form of corruption or bribery that may impact SEK’s decision making, processes or processing of a matter. This also includes facilitation payments, meaning payments to speed up the processing of a case.

No employee or representative for SEK may, directly or indirectly, offer, promise, give, ask for or accept a bribe. Any such behavior may lead to legal action as well as the termination of employment, assignment or business relationship.

Business decisions are to be made on business grounds and no gift or representation is to be provided that could be perceived as improper or entailing some form of expected service in return.

SEK does not tolerate corruption in any form in the transactions that SEK finances. SEK will manage corruption risks in such a manner as to retain the confidence of our operating environment. International guidelines act as a guide in efforts to combat corruption.

SEK holds a position against nepotism and does not participate in sponsoring nor does the company give donations to political parties.

4. Swedish and international guidelines

The following Swedish and international guidelines that combat corruption are to act as a guide for SEK and SEK's employees:

- The Swedish Anti-corruption Institute's (IMM) Code to Prevent Corruption in Business.
- The OECD Anti-Bribery Convention and related documents
- The OECD Guidelines for Multinational Enterprises

5. Measures to combat corruption

SEK is to adopt measures to combat all forms of corrupt behavior in operations.

SEK is to have an anti-corruption program that describes the measures taken by SEK to identify and manage internal and external risks of corruption and bribery.

- SEK is to issue and communicate codes of conduct for employees, consultants and suppliers.
- SEK is to, once a year or when required, review or conduct risk analyses of management, function and process levels to identify actual and potential risks for corruption. The risk analysis is to illuminate the corruption risks that SEK meets in its operations, the probability of the risk being realized, the assessment of the consequences should the risk be realized, and which additional measures need to be taken to achieve an acceptable risk level. The analysis is to be based on geographical areas, customers, products, distribution channels and transaction patterns as well as risks related to the actions of SEK's employees.
- In terms of customer and supplier relationships, SEK is to perform risk-based assessments of the risk of corruption to ensure that SEK adopts relevant measures to prevent corruption.
- SEK is to have procedures to combat corruption in relation to customers, suppliers and intermediaries.
- SEK is to provide the opportunity of anonymously reporting suspicion of corruption or other inaccuracies without the risk of negative consequences.

- SEK is to ensure that all employees are regularly trained in anti-corruption measures.
- SEK is to continually follow up and check compliance of this policy.

6. Breaches

Behavior in breach with this policy may lead to legal action as well as the termination of employment, assignment or business relationship.

7. Reporting

The CEO is to inform the Board on a quarterly basis regarding SEK's risks for bribery and corruption.

This is an English translation of the Swedish original. In the case of discrepancies between the English translation and the Swedish original or in the event of a dispute, the Swedish original takes precedence.