



# Fiskars Group Anti-Corruption and Anti-Bribery Policy

## Version history

<b>Accountable</b>			Legal & Compliance Function				
<b>Responsible</b>			Chief Legal Officer				
<b>Framework Code</b>	1.D	Legal and Compliance	<b>Next Revision Date</b>				
<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description</b>	<b>Reviewed Date</b>	<b>By</b>	<b>Approved Date</b>	<b>By</b>
1.0	1 March 2016	P. Bask	Final	31 January 2016	K. Kauniskangas	4 February 2016	A/C
2.0	June 2022	S. Sahlman		September 2022	Anza D'Antonio Abby Brandt Åsa Ericson Hedström	8.5.2023	FGLT



## Contents

1. Purpose and Scope .....	3
2. Ownership, Review and Approval.....	3
3. Communication .....	3
4. Document's Location in the Policy Hierarchy and Framework .....	4
5. Validity .....	4
6. Definitions .....	4
6.1. Corruption .....	4
6.2. Bribery .....	4
6.3. Public Official .....	4
7. Gifts, Hospitality and Other Promotional Expenses.....	5
7.1. Guiding Principles .....	5
7.2. Generally Acceptable .....	5
7.3. Restrictions .....	6
8. Donations and Non-Commercial Sponsorship .....	7
9. Public Officials .....	7
10. Facilitation Payments.....	8
11. Actions Involving Third Parties .....	8
12. Breach of the Policy .....	9
13. How to Raise a Concern.....	9
14. Consequences of Anti-corruption non-compliance.....	10
15. Legal advice.....	10
16. Quick Read of Do's and Don'ts.....	10



## 1. Purpose and Scope

Corruption and bribery can result in extremely high reputational and other type of damage for Fiskars Group. Therefore, it is essential for Fiskars Group to comply with all anti-corruption and anti-bribery laws and be aware of any situations that carry any potential to be categorized as either corruption or bribery. Fiskars Group has zero tolerance for all forms of bribery and corruption and will not (directly or indirectly) offer, pay, seek or accept a gesture, gift or favour to improperly influence a business outcome.

Gifts, gestures of hospitality and other promotional expenses often have a role in maintaining and obtaining customer and supplier relationships. However, in both giving and receiving these gestures, it is important to be mindful that these may be sometimes seen as forms of bribery or corruption. This is why it is essential to make sure that such gestures comply with the principles presented in this Anti-Corruption and Anti-Bribery Policy and that they are used sparingly.

The purpose of this Fiskars Group Anti-Corruption and Anti-Bribery Policy (the '**Policy**') is to **prevent and detect corruption and bribery**, but also to **help you in navigating between what is usually allowed and what is always prohibited**.

Anti-corruption laws vary from country to country. It is always important to examine the rules under applicable laws to ensure compliance with them. Fiskars Group expects employees to seek guidance from the Fiskars Group Legal and Compliance Function regarding any questions which may arise in relation to Anti-corruption compliance. The Fiskars Group will not tolerate any excuse for failing to seek legal advice.

This Policy covers all employees, directors, officers, Fiskars Group Leadership Team members, consultants and other personnel working under Fiskars Group's direction ('**Fiskars People**'), wherever located. Fiskars Group expects all third parties to uphold similar levels of ethics and compliance and to comply with similar requirements as stipulated in this Policy. All third parties are strictly prohibited from engaging in bribery or other corrupt activities on Fiskars Group's behalf. Further, Fiskars Group expects all third parties acting as its business partners to ensure that these principles are communicated to their employees and sub-contractors.

## 2. Ownership, Review and Approval

The Legal & Compliance Function owns this Policy. This Policy is regularly evaluated to ensure that it is up to date.

This Policy shall be approved by the Fiskars Group Leadership Team.

## 3. Communication

The Legal & Compliance Function is responsible for the communication, training and interpretation of the Policy. The Policy and related documents will be made available on Fiskars Group's intranet and updated by the Legal & Compliance Function as necessary.



It is important that this Policy is implemented, embedded and understood throughout all Fiskars Group companies. Appropriate and regular training related to this Policy will be provided to all Fiskars People.

## 4. Document's Location in the Policy Hierarchy and Framework

The location of this Policy in the framework is Global Policies, Legal and Compliance (1.D).

## 5. Validity

The Fiskars Group Leadership Team has approved this version of the Policy on 8<sup>th</sup> of May 2023 and it is applicable as of that date.

## 6. Definitions

### 6.1. Corruption

Corruption is the abuse of entrusted power for private gain. It is typically characterized by dishonest or fraudulent actions and pursuit of some kind of undue advantage.

### 6.2. Bribery

Bribery involves giving and receiving money or anything else of value as an inducement or reward for an improper act. An act is considered improper when it involves someone performing illegally, unethically, in bad faith or in ways that are partial or in breach of a position of trust.

The recipient of a bribe may act in the private sector (e.g., in a business) or in the public sector (e.g., for the government or in a state-owned company).

Bribery can also take place where an offer or payment is made indirectly through a third party, such as an agent.

A bribe may take different forms. It may be a cash payment, gift, favor, hospitality (e.g. meals, hotel stays, tickets, invitations to sporting and cultural events), other promotional expense (e.g. travel and accommodation expenses), political contribution, charitable donation or anything else of value that is offered or given with the aim of gaining an unfair advantage.

### 6.3. Public Official

The legal definition of a public official (**'Public Official'**) varies between jurisdictions but it typically means government representatives or employees of public agencies or state-owned companies. Public Officials are often subject to very strict anti-bribery rules. Therefore, Fiskars People must pay extra attention to their dealings with Public Officials.



## 7. Gifts, Hospitality and Other Promotional Expenses

Fiskars Group requires all Fiskars People to ensure that any gifts, corporate hospitality or other promotional expenses or any other financial or other advantages offered to or accepted from third parties are modest, appropriate, relate to ordinary and common business activities, and comply with applicable laws.

### 7.1. Guiding Principles

Gifts and hospitality may include, for instance, the following: gifts of products, services, cash or cash equivalents and all other things of value, meals, drinks, entertainment, recreation (such as tickets or invitations to sporting or cultural events), travel, accommodation and other forms of hospitality, and other expenditure, such as travel and accommodation expenses that relate to the promotion, demonstration, or explanation of products or services.

The provision and receipt of gifts, hospitality and other promotional expenses are common in business and are generally not unlawful. However, these may be, or appear to be, bribes if, for example, they are provided with the intention of obtaining an improper advantage.

As a general rule, all gifts, hospitality and other promotional expenses must be provided irregularly, in good faith, and with the intention to build or maintain legitimate business relations or offer normal courtesy. Despite the fact that local customs may vary, hospitality and gifts shall always be of minor value, not lavish or extravagant or in excess of generally accepted business practices of the local country.

Any request or offer of that is, or appears to be, a bribe shall be rejected and must be reported to the Fiskars Legal at [compliance@fiskars.com](mailto:compliance@fiskars.com).

### 7.2. Generally Acceptable

#### **Guidance and examples of gifts and hospitality generally considered acceptable:**

The following are examples of gifts and hospitality generally permissible:

- contributing to legitimate expenses of a customer or supplier (such as travel) visiting one of Fiskars Group's facilities for a legitimate business reason,
- taking a customer or supplier to a sporting or a cultural event as part of a public relations exercise designed to build or maintain legitimate business relations,
- hosting an annual event for customers with the intent to build or maintain legitimate business relations,
- giving gifts at annual festivals or other special occasions, e.g. holidays,
- giving gifts that are either: (i) token and of minimal or nominal value (e.g. small promotional items, diaries, calendars, or other similar items bearing the brand or logo of the provider), (ii) modest in value and not lavish or extravagant, or (iii) ordinary and common Fiskars Group brand product.

In general, hospitality measures of conventional nature are considered to be acceptable. Moreover, giving ordinary and common Fiskars Group brand products as gifts is acceptable, because despite the occasionally high retail value of Fiskars Group products, the actual production costs of the products is not equal to the actual retail value of the products.



### 7.3. Restrictions

**It is not acceptable, whether directly or indirectly through a third party, to:**

**Provide** (including offering, promising and authorizing) anything of value to any person:

- with the intention of obtaining, retaining or rewarding any improper commercial or other advantage, or
- to induce any person to act improperly or to reward them for doing so, or
- knowing or believing that acceptance by the other person would itself be improper; or

**Receive** (including requesting, soliciting, agreeing to receive and accepting) anything of value if it is known or suspected that:

- it is offered or provided either with the intention of inducing any person to provide any improper commercial or other advantage or to act improperly, or as a reward for doing so, or
- the request itself is improper.

Gifts valued at **€500** or more are not acceptable. If a gift exceeding this limit is offered, Fiskars People must politely decline and refer to this Policy.

Fiskars Group People should always contact the Legal & Compliance Function at [compliance@fiskars.com](mailto:compliance@fiskars.com) if there is any question as to whether a gift or hospitality measure is acceptable.

Gifts, Hospitality and Other Promotional Expenses	
<p style="text-align: center;"><b>GENERALLY ACCEPTABLE</b></p> <p>Common and ordinary hospitality measures; and Gifting ordinary Fiskars Group branded products; and Gifts that are:</p> <ul style="list-style-type: none"> <li>• minimal in value,</li> <li>• not lavish or extravagant,</li> <li>• per local business practices</li> </ul>	<p style="text-align: center;"><b>GENERALLY NOT ACCEPTABLE</b></p> <p>Gifts that exceed €500 in value, AND Offering or receiving anything that results in any improper commercial or other advantage</p>
Donations and Non-Commercial Sponsorship	
<p><b>SPONSORSHIP AND DONATION RESTRICTIONS:</b> Charitable donations must be</p> <ul style="list-style-type: none"> <li>• legal under applicable local laws; and</li> <li>• not be made with the intent to influence business or official decisions or to gain an unfair commercial or other advantage</li> </ul> <p>Fiskars Group does not support or conduct any initiatives related to:</p> <ul style="list-style-type: none"> <li>• Activities or events having a significant negative environmental impact</li> <li>• Any political organization, campaign, or political activity</li> <li>• Activities, events, or organizations that are discriminatory or unethical</li> <li>• Religious groups for religious purposes</li> </ul>	



## 8. Donations and Non-Commercial Sponsorship

Support and/or donations to any of the following is prohibited:

- Activities or events having a significant negative environmental impact
- Any political organization, campaign, or political activity
- Activities, events, or organizations that are discriminatory or unethical
- Religious groups for religious purposes

Any charitable donation made on behalf of Fiskars Group or by using Fiskars Group resources must be legal under applicable local laws and must not be made with the intent to influence business or official decisions or to gain an unfair commercial or other advantage. For further instructions and guidance related to charitable donations, please refer to the Community Engagement Policy.

## 9. Public Officials

Public Officials are typically subject to very strict anti-bribery rules. Fiskars Group prohibits providing cash, gifts, gift cards, hospitality or anything else of value in attempt to influence a Public Official. This rule applies whether the gift or hospitality is provided directly or indirectly and irrespective of where the Public Official is located. Only low-value and customary promotional gifts are acceptable to give to a Public Official, and must first be permitted through Fiskars Group's **pre-clearance procedure**, discussed in the chart below.

These thresholds refer to the value of a gift or gifts to each Public Official or the cost of hospitality or other promotional expenses per each Public Official.

**Guidance and examples of gifts and hospitality generally considered acceptable** to offer a Public Official (provided that there is no intent to exert improper influence and that pre-clearance is obtained):

- low-value and customary, small promotional items such as a notebook bearing a Fiskars Group brand or logo,
- low-value gifts at special occasions such as the retirement of the Public Official,
- proportionate and reasonable hospitality, low-value promotional and other business expenditure aimed at building or maintaining legitimate relations with the jurisdiction represented by the Public Official, when given in good faith,
- routine business courtesy such as transfers from airport to hotel for site visits.

Public Officials	
<p><b>ACCEPTABLE, WITH PRE-CLEARANCE, IF:</b></p> <p>Gifts, expenses, or hospitality is low value:</p> <ul style="list-style-type: none"> <li>• Values less than €100 require pre-clearance from the line manager</li> <li>• Values exceeding €100 require pre-clearance from Fiskars Legal at <a href="mailto:compliance@fiskars.com">compliance@fiskars.com</a></li> <li>• <b>Note: Local customs and rules vary. Use heightened diligence and caution.</b></li> </ul>	<p><b>NEVER ACCEPTABLE IF:</b></p> <p>Gifts, expenses, or hospitality of high value; OR All gifts, hospitality, and other measures in an attempt to influence a Public Official</p>



## 10. Facilitation Payments

A facilitation payment is a financial payment or gift, often cash, made with the intention to expedite an administrative process by a Public Official. These payments are typically made in connection with obtaining licenses or permits, processing visas, clearing goods through customs or providing police protection, mail or telephone services or access to power and water. Facilitation payments may also be called “facilitating”, “speed” or “grease” payments.

**Fiskars Group considers facilitation payments as bribes regardless of size or local standards and are, therefore, strictly prohibited worldwide.**

Exceptions may be made in serious cases involving health, safety, liberty or property. Such exceptions must be discussed in advance with your manager and the Legal & Compliance Function. In the event a facilitation payment is permitted, it must be properly recorded by the relevant Fiskars Group financial controller for audit purposes.

Facilitation Payments
<b>NEVER ACCEPTABLE</b>

## 11. Actions Involving Third Parties

Fiskars People must also maintain anti-corruption and anti-bribery compliance when using third parties in representing and/or providing services to Fiskars Group. Relevant third parties include, but are not limited to, agents, distributors, suppliers, vendors, and carriers.

**Fiskars People must assess and mitigate any bribery and corruption risks presented by third parties.** These risks may vary depending on, the nature of the relationship, the country of operation and the type of business involved.

Certain situations and factors related to third parties may indicate bribery and corruption (referred to in this Policy as “**Red Flags**”). Such Red Flags include:

- a refusal to provide information in response to due diligence questions; or
- money being passed through a third party to a Public Official; or
- requests for payment in cash.

If Fiskars People encounter a Red Flag, they must immediately report this to their line manager and the Fiskars Legal at [compliance@fiskars.com](mailto:compliance@fiskars.com). Red Flag situations must be resolved before entering or continuing the business relationship with the third party.

All fees, expenses and/or commissions paid to a third party engaged to represent or provide a service to Fiskars Group must be appropriate, justifiable and proportionate. These fees, expenses and/or commissions must be commercially reasonable in the circumstances and used for legitimate services. All payments to third parties shall be made directly. A third party that has no contractual relationship with Fiskars Group shall not be used.





As bribery and corruption often involve inaccurate record keeping, Fiskars Group must ensure that it maintains accurate and proper books, records and financial reporting across all Fiskars Group companies.

In conducting any due diligences processes, the results must always be adequately and properly archived by the respective team and/or manager.

In dealing with higher risk third-party relationships, including e.g., like those with sub-contractors, Fiskars People must be especially cautious and aware of any potential Red Flags. In these types of relationships, the situation must always be adequately and properly documented and archived, to make sure proper documentation exists in case any later inspections or verifications are conducted.

In any situations where you might have any questions or be unsure of how to document situations properly, you may always the Legal & Compliance Function at [compliance@fiskars.com](mailto:compliance@fiskars.com).

### Third Parties

#### SITUATIONS SUBJECT TO PARTICULAR ATTENTION:

- Fees, expenses, and/or commissions must be appropriate, justifiable and proportionate, and used for legitimate services
- Red Flag situations
- A third party refusing to provide information in response to due diligence questions,
- Money being passed through a third party to a Public Official
- A third party requesting payment in cash
- Using parties that have no contractual relationship with Fiskars Group is not permitted.

## 12. Breach of the Policy

A breach of this Policy may result in disciplinary actions, including e.g. dismissal for gross misconduct or termination of employment. Fiskars Group reserves its right to terminate its contractual relationship in accordance with the terms of the relevant contract with any third party who works with or for Fiskars Group if that third party is in breach of this Policy or any contractual provisions regarding anti-corruption and anti-bribery.

## 13. How to Raise a Concern

In case of any questions and/or uncertainties related to this Policy, please seek guidance from your manager or the Legal & Compliance Function at [compliance@fiskars.com](mailto:compliance@fiskars.com).

Anyone becoming aware of an actual or suspected breach of this Policy **must** raise a concern as soon as possible. A concern may be raised confidentially in line with the **Fiskars Group Code of Conduct** and the Fiskars Group **Code of Conduct Violation Response Policy**. For more information, see the [intranet page on the Code of Conduct](#).

Fiskars Group will not permit retaliation against anyone for refusing to take part in bribery and/or corruption, for raising a concern or for reporting wrongdoings in good faith. Any suspicions of such treatment shall be informed immediately to one's line manager, the Legal & Compliance Function at [compliance@fiskars.com](mailto:compliance@fiskars.com), or the local or Fiskars Group HR.



## 14. Consequences of Anti-corruption non-compliance

The consequences of Anti-corruption noncompliance are serious, both for the Fiskars Group, Fiskars Group leadership, and individual employees.

**Reputation:** Anti-corruption allegations attract significant media coverage and threaten the Fiskars Group's reputation in the market and more importantly damage consumers' and stakeholders' trust. Anti-corruption investigations and fines can undermine the Fiskars Group credibility in its dealings with governmental and regulatory agencies in other fields.

**Fines:** Global companies found guilty of Anti-corruption violations are regularly fined hundreds of millions of €/USD. In addition, some jurisdictions fine individual employees, and the amounts can reach hundreds of thousands €/USD.

**Criminal Risk:** Prison time is available as a punishment in many countries. Countries with criminal Anti-corruption penalties on the following Fiskars Group's markets: Australia, Brazil, Canada, Chile, Israel, Japan, Mexico, the Netherlands, the UK and the US.

**Civil liability/Damages:** The Fiskars Group may also be sued by injured parties for damages resulting from infringement of Anti-corruptions. This includes class actions of groups of victims of Anticorruption infringements. Many governments, including the EU, actively encourage this as a form of "private enforcement" of Anti-corruption.

**Contractual risk:** Illegal terms in a contract can lead to the offending clause or even the whole agreement being deemed void and unenforceable.

**Internal costs:** In addition to these penalties, the cost of defending Anti-corruption claims or investigations by the authorities can be staggering both in terms of external legal fees and loss of management time due to the serious disruption of day-to-day business.

## 15. Legal advice

The Fiskars Group expects all of its employees to report any instance of non-compliance with the law and to inquire about any activity that might not comply with the law. Fiskars Legal & Compliance Function is the only Function authorized to seek legal advice from external advisors; this includes advice on Anti-corruption and Anti-bribery matters/situations.

## 16. Quick Read of Do's and Don'ts

Below you can find a simplified, non-exhaustive summary list of examples of some of the guiding principles referred to above in this Policy relating to both giving and receiving gifts, hospitality, and other promotional expenses:



### Generally acceptable

- Gifts, hospitality and other promotional expenses relating to **ordinary and common business activities**, e.g.:  
building/maintaining legitimate business relations: taking customers/suppliers to a sporting or a cultural event, hosting an annual event for customers etc.,  
giving gifts at annual festivals or other special occasions, e.g. during Christmas time, or gifts that (i) are of minimal value, (ii) are not lavish or extravagant, or (iii) bear a Fiskars Group company logo or brand
- Common and ordinary Fiskars Group branded items as gifts
- Gifts valued **under EUR ~500** (or local currency equivalent)
- 

### Never acceptable

- Gifts valued **over EUR ~500** (or local currency equivalent)  
Exceptions may exist, e.g., relating to Fiskars Group branded items etc.
- Facilitation payments ("grease payments")  
Some exceptional situations may occur, such as when one's life is at risk
- Support and/or donations to:  
political organizations or campaigns; activities having a significant negative environmental impact; activities, events, or organizations believed to be discriminatory or unethical; religious groups for religious purposes; individuals (scholarships, stipends, research; however excluding trainee programs and internships) etc.
- Gifts etc. given with any intention to gain commercial or other advantage, or to influence someone to act improperly

### Situations that always require further attention

- Gifts for Public Officials:  
valued over **EUR ~100** (or local equivalent) > pre-clearance from Legal & Compliance ([compliance@fiskars.com](mailto:compliance@fiskars.com))  
valued under **EUR ~100** (or local equivalent) > pre-clearance from the respective line manager
- Unusually generous hospitality, gifts or expense coverages
- Red Flag situations:  
a third party refusing to provide information in response to due diligence questions,  
money being passed through a third party to a Public Official, or  
a third party requesting a payment in cash

However, as the above listing is extremely simplified and matters must always be analyzed on a case-by-case basis, refer to the more detailed principles above in this Policy or ask for further guidance from the Legal & Compliance Function at [compliance@fiskars.com](mailto:compliance@fiskars.com).