

Anti-Bribery and Corruption Policy

EMS0182 v.3

Owner: President & CEO

Approver: Executive Management and the Board of Directors

Purpose

Elekta is committed to conducting business with the highest ethical standards and with the utmost integrity in all its operations throughout the world.

The purpose of this Policy is to outline and explain the prohibitions against bribery and corruption in all Elekta operations and to highlight specific compliance requirements relating to interactions with customers, Health Care Professionals and Governmental Officials.

The rationale for this Policy is not just legal compliance; Elekta reiterates its strong commitment to fighting corruption as it distorts prices, raises costs, undermines competition and ultimately leads to healthcare decisions that harm the interests of patients and their healthcare providers.

Failure to comply with anti-bribery and corruption laws, as well as industry-specific laws and regulations regarding interactions with Health Care Professionals, may have severe consequences for Elekta and Elekta Professionals. It could result in loss of business, substantial fines, reputational damage and in some cases, imprisonment.

Requirements

Elekta Professionals and Representatives must adhere to all applicable anti-corruption laws as well as industry-specific laws on interactions with Health Care Professionals of every country in which Elekta conducts business, as well as laws that have global reach, for example the U.K. Bribery Act and the U.S. Foreign Corrupt Practices Act. These laws prohibit all forms of corruption, which include bribery, kickbacks and other means of improper influence, regardless of where the corrupt activity takes place.

Prohibition of improper payments

Everyone working for or on behalf of Elekta is expressly prohibited from offering anything of value in an effort to unduly influence others in business dealings. This applies to every country around the world and to interactions with both governments and the private sector. Opportunities that are subject to making improper or concealed payments must be turned down. Any activity that could be perceived as inconsistent with Elekta's commitment to business with the highest ethical standards, as reflected in Elekta's Code of Conduct, is prohibited.

Representatives

Elekta can be held liable for the actions of Representatives and accountable for failing to take sufficient steps to prevent Representatives from participating in bribery or related conduct, whether or not Elekta was actually aware of the alleged improper conduct. Elekta Professionals may not direct or use a Representative to carry out an activity that does not conform to this Policy and all applicable laws. Contributing financial means to any third party in a way that could constitute negligent financing of corruption is prohibited. Representatives involved in the sale of Elekta products and services to customers and in dealings with Government Officials for and on behalf of Elekta, must be reviewed, approved and managed in accordance with Elekta's Policy on Business Representatives and the Third Party Risk Management Process.

Facilitation payments

Elekta prohibits facilitation payments (i.e., a small payment made to a Government Official to obtain or expedite a routine activity performed as a government service), whether made directly or indirectly through a Representative.

In some exceptional circumstances, payments may be demanded from Elekta Professionals under threat of violence, personal harm or imprisonment. Elekta Professionals are authorized to make a so-

called "safety payment" under these circumstances to secure their own safety or the safety of others. These payments must be reported to your manager or Elekta's Compliance Function.

Receiving business courtesies and other items of value

Elekta Professionals are prohibited from accepting anything of value from any person or entity where it is designed to improperly influence an action or obtain an improper advantage. Elekta Professionals may accept gifts, benefits or hospitality, provided they are occasional and of modest value and offered in connection with a legitimate business purpose.

Elekta Professionals shall return inappropriate gifts or reply to the invitation with a polite explanation of Elekta's policy. If this is not possible due to the given circumstances or impractical to do so, the Elekta Professional should contact his or her manager for advice. It is then the manager's responsibility to contact Elekta's Compliance Function for advice.

Political donations

Elekta prohibits contributions, payments or endorsements to political parties, political committees, or to individual politicians or candidates. Elekta Professionals may not make any political contributions on behalf of Elekta or through the use of Elekta corporate funds or resources.

Mergers and Acquisitions

Mergers & Acquisitions are conducted according to Elekta's M&A Process, which contains principles for due care and performing anti-corruption and due diligence procedures.

Books and Records

In order to prevent the possibility of bribes and kickbacks being paid or accepted, all Elekta financial records must fairly and accurately reflect each transaction and be supported by legitimate documentation such as purchase order, contract and invoice. Concealed, unrecorded or unreported transactions are prohibited. All expenses must be promptly entered into company records before reimbursement.

Requirements for Interactions with Customers, Health Care Professionals and Governmental Officials

The below requirements may be supplemented by Local Supplements that address local laws, regulations and industry-specific requirements (for example, monetary thresholds for meals) in specific countries and/or regions. Always refer to the Anti-Bribery and Corruption Handbook and the Local Supplements for further guidance in your Elekta-related interactions, as these form an inseparable part of Elekta's anti-corruption program.

Meals, entertainment and hospitality

Meals, entertainment and other forms of hospitality provided by an Elekta Professional or Representative **must be:**

- Reasonable in amount and frequency
- Directly related to a legitimate business activity involving representatives with a genuine need to be present
- Conducted at an appropriate location and venue
- Permitted by the recipient's own company policies

Do not offer meals, entertainment and other forms of hospitality that:

- Influence someone to purchase, order, or recommend Elekta products or services
- Interfere with the recipient's duties by creating a sense of obligation to give something in return
- Are offered in the form of cash or cash equivalents (for example gift certificates, airline miles, lottery tickets, etc.)
- Are for spouses or family members

Travel and lodging

Travel or lodging provided by an Elekta Professional or Representative must be:

- Reasonable in amount and frequency
- Directly related to a legitimate business activity involving representatives with a genuine need to be present
- Conducted at an appropriate location and venue
- Permitted by the recipient's own company or institution's policies

Do not use travel and lodging to:

- Influence or reward a decision to purchase, order, or recommend Elekta products or services
- Interfere with the recipient's duties by creating a sense of obligation to give something in return
- Extend beyond the duration of the approved Elekta activity
- Provide for spouses and other guests

Customer Gifts

Gifts to customers are generally discouraged. Any offering of gifts by an Elekta Professional or Representative shall be made openly and must be:

- Provided solely as a gesture of goodwill or thanks
- Modestly priced
- Offered only occasionally
- Permitted by the recipient's own company or institution's policies

Do not use gifts to:

- Influence someone to purchase, order, or recommend Elekta products or services
- Interfere with the recipient's duties by creating a sense of obligation to give something in return
- Provide cash or cash equivalents (gift certificates, vouchers, etc.) or a loan

Grants and donations to support healthcare-related causes

Grants and donations must be:

- Made for the sole purpose of advancing a genuine educational, scientific, or charitable purpose
- Made without regard to the volume or value of purchases of Elekta products or services
- Approved by Elekta Professionals outside of the sales and marketing functions
- Fully and accurately documented to reflect the purpose of the expense

Do not use grants and donations to:

- Award in return for a decision by a Health Care Professional to purchase, order, or recommend Elekta products or services

Conference sponsorships

Sponsorship of a non-Elekta healthcare-related conference (e.g., ASTRO, ESTRO) for business promotional purposes must be:

- Conducted for genuine promotional, scientific and/or educational purposes
- Independently controlled and managed by the conference host, including with regard to the selection of program content, faculty, attendees, educational methods, and materials

Do not use conference sponsorships:

- As an award in return for a decision by a Health Care Professional to purchase, order, or recommend Elekta products or services

Consulting and honoraria for Health Care Professionals

A speaking engagement, consulting arrangement, appointment to an advisory board, or other similar opportunity offered to a Health Care Professional must be:

- Based on a legitimate business need
- Entered into without regard to the volume or value of purchases of Elekta products or services
- Compensated based on fair market value of the services provided
- Permitted by the Health Care Professional's own company or institution's policies
- Documented in a written contract reviewed by Elekta's Legal Department

Do not offer these opportunities to a Health Care Professional:

- To influence or reward a decision by a Health Care Professional that benefits Elekta (for example, to purchase, order, or recommend Elekta products or services)
- To interfere with the recipient's duties by creating a sense of obligation to give something in return

Research and collaboration with Health Care Professionals

Research, collaboration and other product development initiatives involving Health Care Professionals must be:

- Based on a genuine need for research, collaboration or product development
- Entered into based on the qualifications and expertise of the Health Care Professional without regard to the volume or value of purchases of Elekta products or services
- Evaluated, negotiated, selected and managed solely by Elekta Professionals outside of Sales and Marketing functions following established processes (except for when research funding is requested as part of a public tender and is legally permissible. All such requests should be submitted to Legal and Compliance for prior assessment)
- Compensated based on the fair market value of the services provided by the Health Care Professional

Do not use these initiatives:

- To influence or reward a decision by a Health Care Professional that benefits Elekta (for example, to purchase, order, or recommend Elekta products or services)
- To create a sense of obligation to give something in return

Glossary

Anything of value

Any type of benefit – tangible or intangible, direct or indirect – to the recipient. This includes, but is not limited to, cash, loans, enhanced commissions, offsets, gifts, jobs, tuition, scholarships, entertainment, travel and donations.

Corruption

Giving, offering, or authorizing anything of value to any person in order to influence their acts or decisions improperly.

Representative

Third parties involved in sales for or on behalf of Elekta (such as Agents, Distributors, sales consultants and other intermediaries) or for dealings with Government Officials on behalf of Elekta (such as customs brokers, product registration agents and other agents).

Government Official

A person working on behalf of a government entity, including but not limited to officers or employees of any government entity, ministry, department, or agency; a head of state, royal family member, judge, magistrate or legislator; employees of a state or government-owned or controlled company; political party members and candidates for

political office; employees or representatives of a public international organization (e.g., World Bank, IMF, UN, etc.); or any person designated as a government official under local law.

Health Care Professional (HCP)

A Health Care Professional (HCP) is defined as any person involved in the purchase, lease, recommendation or use of Elekta products or services. This includes clinicians (e.g., doctors, physicists, dosimetrists, nurses, etc.) and non-clinicians (e.g., clinical directors, administrators, purchasing managers, officers, employees, consultants, etc.) working for or representing a hospital, cancer center or other healthcare provider. The term does not include Elekta employees operating in such a capacity who may otherwise fall within the definition of HCP, or Representative, Service Partners, or Integrators.

HCP is a broad term covering anyone affiliated with a customer or potential customer of Elekta, regardless of whether the person operates in a clinical or non-clinical capacity.

Associated Global Policies and Ways of Working Documents

Document (EMS number if applicable)	Where to find it
Code of Conduct (EMS0177)	Elekta intranet or www.elekta.com
Business Representative Policy (EMS1695)	Global Policy sub-page on the Elekta intranet
Conflict of Interest Policy (EMS0212)	Global Policy sub-page on the Elekta intranet
Anti-Bribery and Corruption Handbook (incl. Local Supplements)	Elekta intranet (Compliance)

Change information and contact person

Chief Compliance & Integrity Officer