

## 2.12 Electrolux Policy on Countering Corruption and Bribery

The Electrolux Group does not tolerate corruption or bribery in any form. Electrolux prohibits the offering or payment of bribes, kickbacks or any other improper benefits to actual or potential customers, agents, contractors, suppliers, government officials, employees of these entities or any other party. Similarly, Electrolux employees shall not demand, arrange or accept bribes, kickbacks or other improper benefits from any entity for the benefit of the employee or the employee's family, friends, associates or acquaintances, or any other person.

This Policy has been adopted by Electrolux Group Management. Group Management members shall implement procedures to ensure compliance with this Policy and, as required, shall adopt local policies and procedures stricter than those set forth here. Failure to comply with the provisions of this Policy will result in disciplinary action.

### Guidance to Ensure Compliance with the Policy

#### Bribes, Kickbacks and Other Improper Benefits

Electrolux prohibits the following improper business payments and practices. Some may constitute criminal offenses and can subject offenders to substantial fines, imprisonment, or both.

- Payments by or on behalf of Electrolux which are unlawful under the laws of any country, state, city and/or county, or any jurisdiction;
- Offering, giving, demanding or receiving bribes, payoffs, kickbacks, or other improper payments to or from customers, contractors, agents, suppliers or government officials, employees of these entities, or any other person or entity;
- Payment of dealer rebates or other deviations from normal terms of sale outside of the country where the business is being conducted, where the payments would violate the laws of the country where the business is being conducted;
- Payments by or on behalf of Electrolux with the intention or understanding that a part or all of such payment is to be used for any purpose other than that described by the document supporting the payment.

#### Gifts, Hospitality and Expenses

Gifts, hospitality and expenses offered to or received from employees of customers or suppliers (including prospective customers or suppliers) must meet the following criteria:

- Gifts, hospitality and expenses shall comply with normally accepted business practices, and comply with the policies of the organization employing the recipient;
- Gifts, hospitality and expenses can only be offered if they are considered legal and comply with generally acceptable ethical practices in the area of operations. Such gifts, hospitality or expenses must be an ordinary social amenity or normal business sales promotion;
- The facts surrounding the gift, hospitality or expenses would not be embarrassing to Electrolux if disclosed;
- Lavish expenditure shall be avoided when entertaining an employee of a customer, supplier or prospective customer or supplier;
- Electrolux employees may not accept hospitality, expenses or gifts from customers, suppliers, or prospective customers or suppliers where the cost to the host would appear to be more than is reasonable and customary;
- Electrolux employees may not accept hospitality, expenses or gifts from any customers, suppliers, or prospective customers or suppliers that may unduly influence or prejudice the relationship.

#### Agents

Agents are generally independent organizations or individuals engaged to help the company solicit business for specific products or services.

- Electrolux employees shall not channel improper payments through an agent.
- Electrolux shall undertake due diligence before appointing an agent.
- Compensation paid to agents shall be appropriate and justifiable remuneration for legitimate services rendered, and shall not be paid outside of the country where the business is being conducted, where the payments would violate the laws of the country where the business is being conducted.
- Agency relationships shall be documented.

- Responsible Electrolux managers shall monitor the conduct of agents, and should have a contractual right to terminate the relationship in the event an agent has paid bribes.

### **Guidance and Reporting**

Whenever in doubt about a particular situation, employees are required to consult with a manager of higher rank in the employee's line of reporting and, as necessary, to make an inquiry to other relevant internal officers for guidance. Such guidance must be made in writing. Employees are required to report any actual or potential non-compliance to relevant internal officers, with the assurance that there will be no retaliation or other negative consequences for persons reporting in good faith. Reports of violations of this Policy may be submitted anonymously and confidentially to the chairman of the Electrolux Audit Committee.

### **Other Related Documents in Group Policies & Procedures**

- 2.2 Authorization to sign external documents for companies within the Electrolux Group
- 2.3.3 Do's and Don'ts (Conduct Involving Competitors, Distributors and Customers)
- 2.7 The Electrolux Workplace Code of Conduct
- 2.9 The Electrolux Group Code of Ethics
- 3.5 Sponsorship
- 6.2 Conflicts of Interest
- 7.2 Purchasing

