

Anti-Corruption Policy, reviewed 08.03.2020, originally published on 25.06.2015.

Anti-Corruption Policy

Planmeca Group is committed to developing the sustainability and responsibility of its operations continuously, prohibiting corruption being an integral part of this.

This policy outlines the acceptable anti-corruption practices concerning the employees, management and business partners of Planmeca Group. The purpose of this policy is to ensure a full compliance with domestic and foreign anti-corruption laws and rules to prohibit all improper payments, gifts or inducements.

Scope

This policy applies globally to all employees, management and business partners of Planmeca Group and it includes instructions concerning inappropriate engagement with third parties and raising concerns regarding corruption and bribery. The guidelines are subjected to any company or individual that has a role in supplying goods or services, developing, marketing, selling or buying products or services on behalf of Planmeca Group.

Corruption can be defined as the abuse of entrusted power for private gain. A bribe refers to an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Bribe can be anything of value, including gifts, cash, entertainment or other courtesies. For companies, corruption most commonly occurs in bidding processes, audits, agreement performance, as substitution of products, and falsification of costs.

Compliance with laws and agreements

All business and other activities related to Planmeca Group shall be carried out strictly in compliance with all applicable laws and this anti-corruption policy.

Corruption is strictly illegal and punishable for both individuals and companies in most countries. Despite the laws, corruption does occur, being also a part of the cultural practice in certain countries. Therefore, we expect the companies and individuals that we work with to take responsibility in prohibiting improper corrupt behaviour.

Gifts and hospitality

This policy does not prohibit reasonable and appropriate hospitality and gifts given to or received from third parties. Hospitality and gifts are considered normal and appropriate when they:

- Comply with the local law
- Are not intended to influence a third party to obtain or reward the provision of business advantage or to exchange explicit or implicit favours or benefits
- Are not offered by or accepted from domestic or foreign government officials or representatives, politicians or political parties without the prior approval of the superior
- Are given in company name, not personal name
- Do not include cash, gift certifications or vouchers
- Are given openly, not secretly

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Engagement with third parties

According to this policy, it is not acceptable to give, promise to give, offer or accept a payment, gift or hospitality to or from third parties on behalf of or in the name of any Planmeca Group companies, with an expectation or promise of business advantage. The improper and illegal payments include bribes, facilitation payments and kickbacks of all kinds. If the purpose of the payment, gift or hospitality is suspected improper, it shall not be accepted.

All invoices, accounts, notes and other documents and records related to third parties should be prepared and maintained with strict accuracy and completeness. No records shall be kept secret to facilitate or conceal improper payments.

Political and charitable contributions

Planmeca Group does not make and expects that its cooperation partners do not make contributions to politicians or political parties with an intention to influence political community or legislative processes.

Raising a concern

Planmeca Group encourages all its stakeholders to raise a concern about any issue or suspicion of malpractice at the earliest possible stage. Also, if subjected to bribery or corruption, offered a bribe, asked to make one, suspected that this may happen in the future, or when unsure whether a particular act includes bribery or corruption, all stakeholders are asked to always consult their superior or a representative of Planmeca Group.

References

UN Convention against Corruption

www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf

OECD Anti-Bribery Convention

www.oecd.org/corruption

Finnish criminal law

www.finlex.fi/fi/laki/ajantasa/1889/18890039001