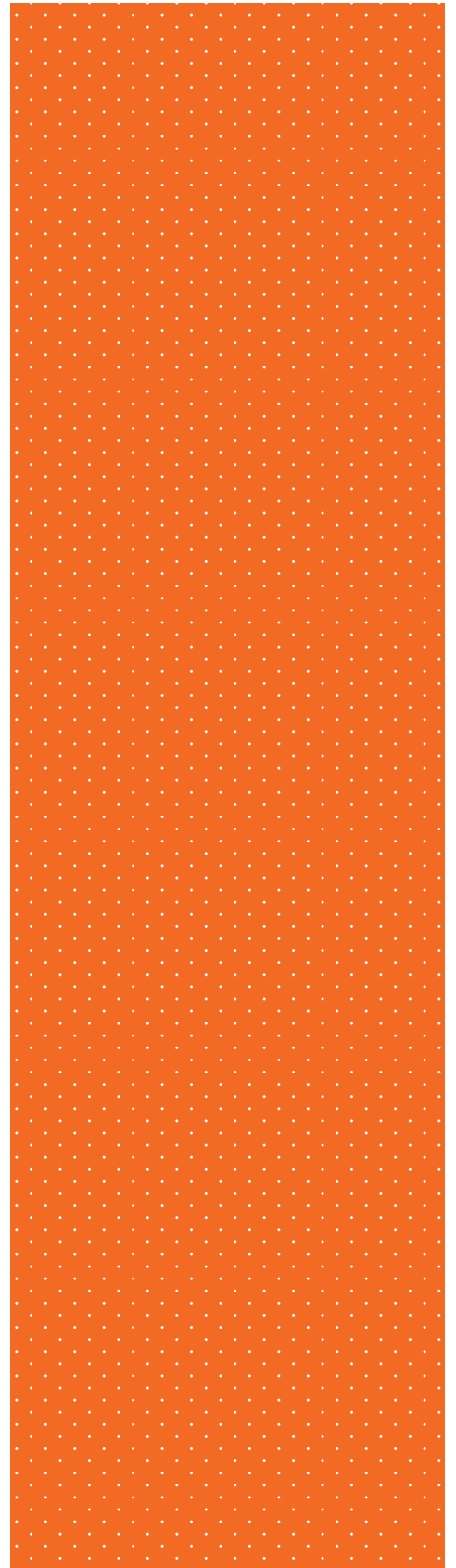


Elekta Anti-Corruption Policy  
and Guidelines for Interactions with  
Health Care Professionals



# Doing the right things in the right way

## Understand

I understand our Code of Conduct and apply it in my daily work

## Act

I act with integrity

## Seek

I seek guidance

## Speak up

if you believe that someone has done, is doing, or may be about to do something that violates Elekta's Code of Conduct or the law.

**PURPOSE**

This Policy enhances and supplements the standards of conduct regarding bribery and corruption and other improper influence and gives additional guidance on interactions with Healthcare Professionals and Government Officials as set out in applicable laws and Elekta’s Code of Conduct.

**SCOPE**

**Who is covered by this Policy?**

This Policy applies to all Elekta Group companies (including controlled entities) and its employees and directors (“Elekta Professional”) and everyone conducting business on Elekta’s behalf, including agents, sales consultants, distributors and service partners (“Elekta Representatives”).

**RESPONSIBILITY**

Every Elekta Professional and Elekta Representative is responsible for reading, understanding and following the standards set forth herein.

Elekta managers are responsible for ensuring that these standards of conduct are implemented in their line organizations, and that the employees within their area of responsibility are familiar with and follow these standards of conduct.

Elekta’s Compliance Department is responsible for the maintenance, training and monitoring of this Policy as well as for investigating all reports of potential violations of the Policy.

“Acting in accordance within the boundaries of this Policy and the ethical values of our Code of Conduct is the only way to secure Elekta’s success, sustainability and resilience.”

**Laurent Leksell,  
Chairman & Founder**

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**This document sets forth mandatory standards of conduct adopted by the Board of Directors of Elekta AB on August 30, 2016. They correspond to the Elekta Anti Corruption Policy and the Anti Corruption Procedure in the Elekta Management System.**

## Our commitment

**Elekta's commitment to conducting business with the highest ethical standards is outlined in the Elekta Code of Conduct:**

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 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 our Code of Conduct, is prohibited.

Elekta Professionals and Representatives shall adhere to applicable anti-corruption laws of every country in which Elekta conducts business, as well as the 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.

## What is corruption?

**Corruption means giving, offering, or authorizing anything of value to any person in order to influence their acts or decisions improperly. Corruption can also be used to cause or reward a person for acting contrary to a duty or obligation.**

Corruption is not limited to blatant bribery and cash payments made behind closed doors. Even ordinary business activities (such as meals and entertainment) that might be permissible under different circumstances may be seen as improper. Corruption is not always intentional or obvious. Some activities that could be viewed as illegal today may not have been illegal forms of corruption in the past.

Corruption can be carried out directly by Elekta's employees or indirectly through a third party. Importantly, Elekta and its employees can be held liable for corruption carried out by a third party, even if they had no actual knowledge that a corrupt activity occurred.

**Some activities that could be viewed as illegal today may not have been illegal forms of corruption in the past.**

# The consequences of corruption

**Corruption distorts prices, raises costs, undermines fair competition, and ultimately leads to healthcare decisions that harm the interests of patients and their healthcare providers.**

Corruption acts as a stain on a company's reputation and undermines its competitiveness. This is particularly true for companies supplying goods and services in the health-care sector, since unfair dealings and corrupt practices by suppliers can violate contractual obligations and create risks and liabilities for their customers. In today's world, failure to comply with anti-corruption laws can translate into lost business opportunities, now and in the future.

“Corruption undermines legal business activities, distorts competition and limits growth.

Preventing corruption at Elekta is not only a legal obligation, it is also an ethical standard

Finally, the enforcement costs associated with corruption are severe. Fines and penalties can rise to levels that threaten the financial stability of global companies like Elekta. Employees can be detained, jailed and criminally prosecuted. Even when nothing illegal has occurred, the appearance of potential misconduct can cause a company to be the target of an investigation or lawsuit. A news article about corruption, alone, can significantly disrupt a company's financial and operational performance.

# We expect you to

Follow the guidelines in this policy

Participate in anti-corruption training

Seek advice and speak to your manager if you have any questions



**Public and Healthcare sectors**  
an area of heightened risk

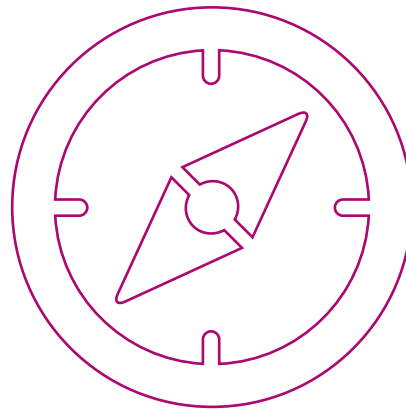


**Corruption can occur in both commercial dealings and dealings with government authorities. Elekta does not distinguish between these forms of bribery and prohibits both forms.**

Most countries have laws and regulations specific to the healthcare sector, for example, anti-kickback laws, that prohibit using something of value to influence referrals, recommendations or the purchase, lease or order of a healthcare item or service. They apply to companies that

supply products and services to healthcare providers, company employees and third parties.

In addition, many countries have adopted industry codes that addresses different types of interactions with health care professionals. The guidelines set forth herein align Elekta's practices with applicable laws, relevant industry codes and its commitment to the highest ethical standards in the industry.



## Guiding principles for interactions with healthcare professionals

Follow these basic principles:

**1**

### SEPARATION

Make sure a clear separation exists between any advantages or benefits provided to healthcare professionals and the decision to purchase Elekta products or services.

**3**

### TRANSPARENCY

Any benefits or advantages to healthcare professionals must be disclosed to the appropriate administration or management level of the healthcare provider, and, where required, to local authorities.

**2**

### PROPORTIONALITY

Any consideration given to a healthcare professional in exchange for a service or other performance should not exceed fair market value.

**4**

### DOCUMENTATION

All arrangements involving an advantage, benefit, or item of value provided to a healthcare professional must be clearly documented.

# Areas of risk

**Elekta has adopted specific guidelines and procedures related to high-risk business activities to ensure certain types of interactions do not create risks for Elekta or a recipient. Adherence to these guidelines protects Elekta and reinforces the mutual trust and loyalty Elekta shares with its customers, business partners and the broader global community.**

These global guidelines may be supplemented by local standards of conduct that address local laws, regulations and industry-specific requirements in particular countries and/or regions. Always refer to these local standards for further guidance in your Elekta-related interactions, as these form an inseparable part of Elekta's Anti-Corruption Program. Where Elekta has developed supplementary standards, they are attached to this document as Local Supplements (available internally).





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**THESE GLOBAL GUIDELINES** may be supplemented by local standards of conduct that address local laws, regulations and industry-specific requirements in particular countries and/or regions.

Always refer to these local standards for further guidance in your Elekta-related interactions, as these form an inseparable part of Elekta's Anti-Corruption Program.

# We are here to help you



**HELP & ADVICE**  
[compliance@elekta.com](mailto:compliance@elekta.com)



## MEALS, ENTERTAINMENT & HOSPITALITY

**Meals, entertainment and other forms of hospitality provided by an Elekta Professional or Elekta 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

**Meals, entertainment and hospitality may not be:**

- ✗ Used to influence someone to purchase, order, or recommend Elekta products or services
- ✗ Interfering with the recipient's duties by creating a sense of obligation to give something in return
- ✗ Offered in the form of cash or cash equivalents (for example gift certificates, airline miles, lottery tickets, etc.), with the exception of per diems or meal expense reimbursements related to participation at an approved Elekta activity.

## Q&A

**Q: It is customary to discuss business with doctors and other Healthcare Professionals over a meal such as dinner. May we also provide doctors with entertainment and hospitality in addition to dinner?**

A: Entertainment and hospitality may be forbidden under the healthcare laws and local industry codes of some countries like the USA, for example. Where permitted, entertainment and hospitality must always be subordinate in both time and focus to the purpose of the meeting. You need to make sure the activities you are planning are permitted, both under the Local Guidelines (where such exist) as well as the customer's own rules.

In a case like this and depending on the local standards, a drink offered after a dinner may be acceptable, while paying for entertainment at a karaoke bar after a dinner is not. If you have any doubt do not hesitate to contact Elekta Compliance for advice.lobortis rhoncus lacus.



Always check applicable local standards enclosed to this document.

Verify in advance that the recipient's employer or organization permits receipt of these types of business courtesies and/or arrangement



## CUSTOMER GIFTS

Exchanging gifts are often part of local culture and tradition. It is not always easy to draw the line between corruption and acceptable gifts and business courtesies.

**A gift offered or provided by an Elekta Professional or Elekta Representative must be:**

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

**A gift may not be:**

- ✗ Used to influence someone to purchase, order, or recommend Elekta products or services
- ✗ Interfering with the recipient's duties by creating a sense of obligation to give something in return.

## Q&A

**Q: A Professor in the Radiology department of a hospital will soon be celebrating her birthday and we would like to give her a modestly priced present. Conveniently, her birthday coincides with sales negotiations for a new Brachy unit the client wants to purchase. May we deliver the gift to her at the upcoming sales negotiation?**

A: No, a gift offered during a sales negotiation could be seen as an attempt to influence the outcome of the sales negotiations (as a form of bribe) even if clearly this was not your intention.

**Q: We wish to hand out free Elekta branded giveaways at an industry conference. The items include pens and other office supplies that are branded with the Elekta logo. Is this ok from a compliance perspective?**

A: The laws and industry standards vary in terms of what is permissible. Some countries explicitly allow modestly valued company-branded items (like pens and coffee mugs), while others prohibit the same company-branded gifts. To be sure you must consult the Local Guidelines (where such exist) or ask Elekta Compliance for advice.



Always check applicable local standards enclosed to this document.

Verify in advance that the recipient's employer or organization permits receipt of these types of business courtesies and or/arrangement



## TRAVEL AND LODGING

### Travel or lodging provided by an Elekta Professional or Elekta 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

### Travel & lodging may not be:

- ✗ Used to influence or reward a decision to purchase, order, or recommend Elekta products or services
- ✗ Interfering with the recipient's duties by creating a sense of obligation to give something in return
- ✗ In excess of the duration of the related Elekta activity
- ✗ Provided for spouses and other guests

## Q&A

**Q: We have invited a speaker to give a lecture at an Elekta User Meeting in Europe. The speaker will be flying in from Asia and staying for two nights at a hotel near the venue. We have agreed to compensate the speaker at a market rate and would like to provide him with business class air travel. Is this acceptable?**

A: As a rule air travel should be made in economy class. Exceptions to this may be allowed depending on the circumstances in the given case (subject to any additional restrictions in local standards) and the total value of the compensation. If you have any doubt do not hesitate to contact Elekta Compliance for advice.

**Q: We have invited a number of doctors to attend a training session at an approved Elekta training site. The doctors are asking for suites at a luxury hotel. How should I respond to their request?**

A: Paying for accommodation to a customer for training is an acceptable practice, but monetary limits consistent with industry standards have been established in our local standards (where such exist). A luxury hotel most certainly is out of bounds and could be seen as an attempt to unduly influence the doctor. You should respond by politely explaining that Elekta has guidelines in place for the protection of both Elekta and its customers, and these guidelines do not permit hotel accommodations of this type. If the doctor insists, invite him or her to speak with Elekta's Compliance department for more explanation.

**Q: What should I do if a Healthcare Professional submits reimbursement for travel expenses that exceed the limitations in our Anti-Corruption Policy and/or the Local Guidelines?**

A: The best way to address this problem is to avoid it in the first instance. If Elekta will be reimbursing a Healthcare Professional for travel expenses, make sure he or she understands our guidelines in advance of the trip. If the Healthcare Professional nonetheless submits unauthorized expenses for reimbursement, seek guidance from your manager and/or Elekta Compliance.



Always check applicable local standards enclosed to this document.

Verify in advance that the recipient's employer or organization permits receipt of these types of business courtesies and/or arrangement



## CONSULTING AND HONORARIA WITH HEALTHCARE PROFESSIONALS

**A speaking engagement, consulting arrangement, appointment to an advisory board, or other similar opportunity offered to a Healthcare 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 Healthcare Professional's own company policies
- ✓ Documented in a written contract reviewed by Elekta's Legal Department
- ✓ Preceded by written notification to the Healthcare Professional's institution

**These opportunities offered to a Healthcare Professional may not be:**

- ✗ Used to influence or reward a decision by a healthcare professional that benefits Elekta (for example, to purchase, order, or recommend Elekta products or services)
- ✗ Interfering with the recipient's duties by creating a sense of obligation to give something in return

## Q&A

**Q: A doctor working for one of our biggest customers has shown a willingness to volunteer as a speaker to reflect on his experiences with Elekta equipment at different industry events. He is asking for a consultancy fee that is higher than normal, but has suggested this engagement could help Elekta with a potential new order at his hospital. If we negotiate the doctor's rate to a fair market value level, can we proceed with the engagement?**

A: Engaging a Healthcare Professional for a service should never be (and should never be perceived to be) connected to the purchase of Elekta equipment or services. Engaging the doctor under these circumstances is prohibited. We should politely decline the opportunity as a speaker.

**Q: Our Anti-Corruption Policy requires confirmation that hiring a Healthcare Professional is permitted by the Healthcare Professional's own institutional policies. How am I supposed to determine this?**

A: There are several ways to accomplish this, including simply asking the Healthcare Professional for confirmation. Just asking the question demonstrates transparency, good faith and integrity, as well as respect for the conflict of interest rules that may be in place at their institution. As a rule, written notification to the Healthcare Professional's institution is required.



Always check applicable local standards enclosed to this document.

Verify in advance that the Healthcare Professional's employer or organization permits this type of engagement with a medical device company.



## EMPLOYMENT OF HEALTHCARE PROFESSIONALS AND GOVERNMENT OFFICIALS

### Employment of Healthcare Professionals and Government Officials must be:

- ✓ Based on a legitimate employment need
- ✓ Entered into based on the qualifications and expertise of the candidate
- ✓ Compensated at fair market value and at a level consistent with other employees providing similar duties

### Employment of a Healthcare Professionals and Government Officials may not be:

- ✗ In the case of a Healthcare Professional, used to influence or reward a decision by the Healthcare Professional that benefits Elekta (for example, to purchase, order, or recommend Elekta products or services)
- ✗ In the case of a Government Official, used to influence or reward a Government Official decision that benefits Elekta

## Q&A

**Q: The procurement manager at a hospital has hinted at a willingness to make a career change and work for a company like Elekta. The hospital is currently contemplating a large Linac order. We currently have a position open at Elekta and offering the procurement manager the job will increase our chances of winning the order. Can we offer her the job?**

**A:** No. Employment of a Healthcare Professional may never be used to influence or reward someone in an inappropriate manner to purchase Elekta equipment or services. If the purchasing manager decides to pursue the position, the procurement manager must go through the standard employment application process. Appropriate disclosures should be made to the hospital to avoid any actual or perceived conflicts of interest.



Always check applicable local standards enclosed to this document.

Verify in advance that the Healthcare Professional's employer or organization permits this type of engagement with a medical device company.



## RESEARCH AND COLLABORATION WITH HEALTHCARE PROFESSIONALS

### Research, collaboration and other product development projects involving Healthcare Professionals must be:

- ✓ Based on a genuine research or product development need as determined by Elekta Product Lifecycle Management
- ✓ Entered into based on the qualifications and expertise of the Healthcare Professional (or Healthcare Organization) without regard to the volume or value of purchases of Elekta products or services
- ✓ Evaluated, negotiated, selected and managed solely by Elekta Professionals within Elekta Product Lifecycle Management
- ✓ Compensated based on the fair market value of the services provided by the Healthcare Professional (or Healthcare Organization)
- ✓ Permitted by the Healthcare Professional's (or Healthcare Organization's) own company policies
- ✓ Documented in a written contract reviewed by Elekta's Legal Department

### These projects may not be:

- ✗ Used to influence or reward a decision by a Healthcare Professional (or Healthcare Organization) that benefits Elekta (for example to purchase, order, or recommend Elekta products or services)
- ✗ Creating a sense of obligation to give something in return

## Q&A

**Q: A potential client has proposed a research arrangement whereby Elekta would supply equipment for free in return for receiving clinical data generated during the research project. The client indicated a potential interest in purchasing the equipment after the research concludes.**

**A:** Research arrangements with customers must be separate, independent and may not be contingent upon a commercial transaction or sale of Elekta products and services. If the arrangement is based on a genuine research need with contractually agreed milestones and deliverables, as determined by Elekta Product Lifecycle Management, and it fulfills the other requirements set out in the Anti-Corruption Policy and Local Guidelines (where such exist), this arrangement would be acceptable.



Always check applicable local standards enclosed to this document.

Verify in advance that the Healthcare Professional's employer or organization permits this type of engagement with a medical device company.



## GRANTS AND DONATIONS

### 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 who are not involved in the sale of Elekta products and services
- ✓ Fully and accurately documented to reflect the purpose of the expense

### Grants and donations may not be:

- ✗ Awarded in return for a decision by a Healthcare Professional to purchase, order, or recommend Elekta products or services

## Q&A

**Q: An Elekta customer who just purchased a new Elekta Linac has asked us for a grant to support an upcoming scientific symposium hosted by her institution. The requested amount is not very high and the grant would be a nice gesture showing our appreciation for receiving the customer's business. Can we provide the grant to support the symposium?**

**A:** Grants for events of this type must be made for the purpose of advancing an educational, scientific or charitable goal of Elekta. Providing a customer with a grant as a thank you for purchasing an Elekta product would not be appropriate. Unless the symposium advances an identified scientific goal for Elekta, we must decline the offer. It is important that we avoid any real or perceived connection between the purchase of Elekta products and services and the awarding of grants (and other items of value) to customers.



Always check applicable local standards enclosed to this document.

Verify in advance that the recipient's employer or organization permits receipt of these types of business courtesies and/or arrangement





## 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
- ✓ Approved by Elekta Professionals who are not involved in the sale of Elekta products and services
- ✓ Independently controlled and managed by the conference host, including with regard to the selection of program content, faculty, attendees, educational methods, and materials

Conference sponsorships may not be:

- ✗ Awarded in return for a decision by a Healthcare Professional to purchase, order, or recommend Elekta products or services

## Q&A

**Q: An Elekta customer has asked us to sponsor an industry conference held at a beach resort in Hawaii. The conference agenda seems to be quite heavy on recreational activities with very few hours allotted for educational or scientific presentations. Sponsoring the event would generate plenty of marketing benefits for Elekta, and would create goodwill in the eyes of our customers. May we sponsor the conference?**

**A:** Sponsoring medical conferences can form part of customary marketing activities. However, based on the facts provided in this case, this event can be perceived as a way for Elekta to provide improper benefits to Healthcare Professionals. Events of this nature may need to be reviewed by Elekta Compliance as required by the Local Guidelines (where such exist).



Always check applicable local standards enclosed to this document.

Verify in advance that the recipient's employer or organization permits receipt of these types of business courtesies and/or arrangement



## 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\*

*\* Nothing in this section shall prohibit the establishment and operation of a separate segregated fund, as permitted by United States law, to collect voluntary donations from certain eligible employees of Elekta and to make contributions to candidates for elected political office in the United States.*



**Q: A friend of mine is running for political office and I would like to help with the campaign. Is this allowed?**

A: Yes. Your personal political activity is your business. Just make sure that you do not use Elekta resources, including working time, e-mail or Elekta's name, to support the campaign.



**Always check applicable local standards enclosed to this document.**

**Verify in advance that the recipient's employer or organization permits receipt of these types of business courtesies and/or arrangement**



## FACILITATION & SAFETY PAYMENTS

Facilitation payments, also known as “grease payments,” are small payments made to Government Officials to obtain or expedite a routine activity performed as a government service, such as processing a product registration or visa application.

Elekta prohibits facilitation payments, whether made directly or indirectly through a Third Party 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 Department.

## Q&A

**Q: I am travelling abroad and need to get a work visa quickly. The person at the embassy processing my request has said that he can speed up the process if I pay a small amount in cash. What should I do?**

A: This sounds like a facilitation payment, which is not permitted under our policy. The officer at the embassy would have to process the visa request even in the absence of any additional payment being made. You should ask for documentation that explains the fee, for example a published pricelist. You could also state that our company policy does not allow cash payments and that you need a receipt from the embassy for any additional payment. You should never pay a facilitation payment (except in exceptional situations such as treat of violence, personal harm or imprisonment).



Always check applicable local standards enclosed to this document.

Verify in advance that the recipient’s employer or organization permits receipt of these types of business courtesies and/or arrangement

# Receiving business courtesies and other items of value

Elekta Professionals are prohibited from accepting anything of value from any person or entity where it would improperly influence an action or obtain an improper advantage.

## Gifts, benefits or hospitality must be:

- ✓ Occasional and of modest value
- ✓ Offered in connection with a legitimate business purpose

## Gifts or benefits may never be

- ✗ Cash or cash equivalents (gift certificates, shopping vouchers etc.)
- ✗ Work for private purpose
- ✗ Monetary loans
- ✗ Any form of kick-backs (e.g. a personal benefit from a transaction negotiated on behalf of Elekta)

## Some other examples of gifts or offers that are not allowed:

- ✗ Fully or partly paid personal holiday, trips or similar benefits addressed to individuals.
- ✗ Extravagant gifts, such as jewelry, watches or consumer electronics
- ✗ Memberships in sport clubs or similar, such as tennis and golf clubs

## What to do when you have received a gift that might be questionable?

Elekta professionals shall return inappropriate gifts or reply to the invitation with a polite explanation of Elekta's policy. If it is not possible due to the given circumstances or unpractical to do so Elekta Professionals shall contact his or her manager for advice and it is the manager's responsibility to contact the Compliance or Legal Department for advice.

## Q&A

**Q: I have received a \$ 50 gift card from a supplier, can I keep it?**

A: No, gift cards are equivalent to cash and therefore not permitted

**Q: I got an invitation to attend a conference by one of our corporate banks. The conference is situated in Miami with clear business purpose and an opportunity to network with peers. The bank offers to pay for travel and hotel expenses. It would be very interesting and relevant to my job to attend this conference. Can I accept the invitation?**

A: Yes, you could attend if the conference is business related and approved by your manager. However Elekta should pay for the travel and hotel costs.

**Q: One of our IT suppliers has invited the Elekta IT department to a seminar to learn more about their new technical solution. In connection to this, the supplier also invites us for dinner. Can we accept?**

A: Elekta professionals may accept occasional invitations to entertainment as long as it is reasonable, appropriate and have a legitimate business purpose. The fact that the entire team from Elekta is invited makes this invitation more appropriate rather than inviting selectively an individual with who may be influenced in their decision making.



## Relations with Elekta Representatives

Elekta's commitment to conducting business with the highest level of integrity extends to Elekta Representatives. Elekta Representatives are responsible for complying with all applicable laws, the principles set forth in the Elekta Code of Conduct and this Policy at all times.

Elekta Professionals are prohibited from ever asking, directing or using an Elekta Representative to carry out an activity that would not conform to the Elekta Code of Conduct, this Policy, or applicable laws.

### DUE DILIGENCE AND CONTRACT REQUIREMENTS

Elekta Representatives involved in the sale of Elekta products and services to customers and in dealings with Government Officials on Elekta's behalf must be reviewed, approved and managed in accordance with Elekta procedures.

These requirements are outlined in Elekta's Third Party Representative Risk Management Group Steering Documents and involve:

1. A due diligence evaluation using Elekta's on-line due diligence tool, Compliance Desktop, both prior to engagement and renewed periodically; and
2. A written contract approved by Elekta's Legal Department.

Elekta Professionals must continually monitor the activities of Elekta Representatives with whom they work and report any questions or concerns they have about an Elekta Representative to Elekta's Compliance Department or Legal Department.





## **ENFORCEMENT**

Failure to adhere to this Policy will result in disciplinary action, up to and including termination of employment or the contractual relationship. Elekta may also pursue legal proceedings when necessary and appropriate.

## **REPORTING**

Elekta Professionals are expected to report any conduct we believe in good faith to be a violation of this Policy by using the reporting process outlined in the Elekta Code of Conduct.

Elekta expects all Elekta Representatives to inform Elekta of any corruption-related concerns or violations of this policy by contacting Elekta's Compliance Department.

Elekta will not tolerate any form of harassment, discrimination or retaliation against someone who has raised a concern and acted in good faith pursuant to this Policy.

## **HELP AND ADVICE**

Questions related to the content in this policy can be discussed with representatives from Elekta's Compliance Department or the Legal Department.

## **APPROVAL**

This revised policy was approved by the Elekta AB Board of Directors on August 30, 2016.



The standards and supporting policies contained in this document may change from time to time. Elekta employees, consultants, business partners and suppliers are responsible for knowing and complying with the current laws, regulations, standards, policies and procedures that govern our work.

The most current version of the Code of Conduct can be found on the Code of Conduct homepage and on [www.elekta.com](http://www.elekta.com)

[www.elekta.com](http://www.elekta.com)

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