

## Stadium Code of Ethics

### **INTRODUCTION**

Stadium Group and all companies included in the Group (hereafter referred to as Stadium or the Company) value the fact that all the operations of the Company are characterized by honesty, transparency, integrity and fair play. As a Supplier at Stadium, you are obligated to read and comprehend the content in Stadium Code of Ethics and comply with it in all business with the Company.

All business carried out with or on behalf of Stadium should always be conducted in accordance with the Company's Code of Ethics and applicable laws and regulations in the country of business.

### **BRIBERY AND CORRUPTION**

Stadium has a "zero tolerance" policy on bribery and corruption. This applies to all the Company's business and transactions in all the countries in which the Company and its Suppliers operate. The Company does not tolerate bribery in any form. The Company is determined to ensure that the objectives of this Code of Ethics are fulfilled and will therefore further instruct all concerned employee and Suppliers to secure their knowledge and compliance with the principles in this Code. Under this Code of Ethics, a bribe includes financial or other advantages which are given, promised, offered, accepted, requested or received with the intention to influence the ability to make objective and fair business decisions. As a Supplier at Stadium, you must not carry out any actions involving bribes when you act in connection with the Stadium business. This includes both domestic and international business and it should be incorporated in all deals, both with private actors and public officials.

### **ADVANTAGE**

Stadium does not allow its employees or other representatives to request, accept, arrange, offer or give any kind of advantage in connection with Company's business. In accordance the Company has a strict no-gift policy. Stadium particularly wishes to point out that employee or other representatives of the Company are not allowed to take any commission from stadium Suppliers. Should any of the Company's employees or representatives openly or implied, ask for a commission or advantage of any kind, you are advised to immediately inform Stadium via [codeofethics@stadium.com](mailto:codeofethics@stadium.com).

In the conduct of company business, it is a violation of Stadiums Code of Ethics if a Supplier offers any kind of advantage to an employee of the Company or other Stadium representatives. The term 'advantage' may include - but is not limited to - the following: gift, loan, money (regardless currency), fees, reward, journeys, services, bonuses, exclusive meals, vouchers of any kind, product samples for personal use, event tickets, discount on private purchases, sponsoring or any kind of personal favors.

### **CORPORATE ENTERTAINMENT AND OTHER EVENTS**

Stadium does not accept invitations for business dinners or other corporate events that are exclusive, inappropriate, occur often or take place in a weekend or public holiday. If an invitation is accepted there is the opportunity that Stadium can either pay the Company's share or return the hospitality on another occasion.

An employee at Stadium must always have the approval of his/her manager before accepting any kind of business invitation.

### **CONFLICTS OF INTEREST**

Conflicts of interest may arise if personal interests compete or conflict with the interests of the Company. As a supplier at Stadium you should avoid any situations that could damage your integrity and/or risk putting Stadium's interests and/or reputation at stake.

## **CONFIDENTIAL INFORMATION**

A Supplier at Stadium must never disclose confidential information to any party outside or within the Supplier.

Confidential information includes but is not limited to; Stadium AB's financial and commercial relationships, trade secrets, buying, offers, strategies, all supplier related information, IT solutions, analyses and sensitive personnel data, information concerning Stadium AB and/or the business carried on within Stadium AB and which is not in the public domain.

By signing this document, you as a Supplier confirm that you undertake not to disclose any confidential information for as long as you have a business relation with Stadium.

It is your responsibility to make sure that you understand the content of Stadium's Code of Ethics and that you observe these guidelines in your daily work.

A Supplier should always strive to assist the Company's efforts to prevent bribes and corruption by ensuring that all operations of the Company continues to be characterized by honesty, transparency, integrity and fair play.

Stadium is committed to continuously reviewing and updating its policies and procedures, therefore this Code of Ethics can be subject to modification. The Company will inform all concerned whenever there is any major changes or updates in the Code.

## **CONSEQUENCES OF NON-COMPLIANCE**

Since most sections of Stadium's Code of Ethics follow the law in each country where the Company operates, any deliberate violation of these guidelines may be a criminal act. A criminal act under the law as stated in the Code of Ethics may result in ending of the business relation, liability to pay damages or a warning.

## **QUESTIONS**

If you have questions concerning the meaning or application of Stadium's Code of Ethics, please contact your main contact person at Stadium.