

# Ethical Risk Assessment of Saab AB for the Government Pension Fund Global

## Section I: Executive Summary and Final Risk Categorization

This report provides a comprehensive ethical risk assessment of Saab AB, a Swedish defense and security company, in accordance with the *Guidelines for Observation and Exclusion of Companies from the Government Pension Fund Global* (GPFG). The analysis focuses on product-based criteria (§3), conduct-based criteria (§4), and associated geopolitical risk exposures.

The assessment concludes that while direct risks related to Saab's product portfolio under §3 are low, the company presents multiple, severe, and ongoing risks related to its conduct under §4. These risks are deemed unacceptable when measured against the ethical norms of the GPFG.

### Key Findings Summary

- **Product-Based Risk (§3):** The investigation finds no conclusive evidence that Saab AB is currently involved in the development or production of weapon systems explicitly prohibited by the guidelines, such as cluster munitions, anti-personnel mines, or central components for nuclear weapons. A historical allegation from 2011, which led to the company's exclusion by another major European pension fund for involvement in cluster munitions, is noted. However, current authoritative monitoring bodies do not list Saab as a producer of such weapons. This past issue, while not a present violation, points to a residual governance and transparency concern.
- **Conduct-Based Risk (§4):** The assessment identifies a pattern of corporate conduct that creates an unacceptable risk of contributing to serious violations of fundamental ethical norms. These findings are the primary drivers of the final risk categorization.
  - **Gross Corruption (§4g):** A recurring pattern of conduct involving credible

allegations of bribery to secure major international contracts is evident. This spans the 1999 Gripen fighter sale to South Africa, for which the company admitted to making payments through an intermediary, and the 2014 Gripen sale to Brazil. The risk related to the Brazil deal is elevated from a historical allegation to an active and material threat by an ongoing investigation, initiated in October 2024, by the United States Department of Justice (DOJ) under the Foreign Corrupt Practices Act (FCPA).

- **Sales to States in Armed Conflict (§4c):** Saab's extensive and ongoing sale, delivery, and support of the advanced GlobalEye Airborne Early Warning and Control (AEW&C) system to the United Arab Emirates (UAE) constitutes a material risk. The UAE is a leading party in the coalition engaged in the armed conflict in Yemen. This conflict is characterized by one of the world's worst humanitarian crises, and the coalition has been credibly accused by international human rights organizations of committing serious and systematic violations of international humanitarian law. Supplying a key "force multiplier" technology like GlobalEye directly enhances the UAE's capacity to conduct the military operations in which these violations occur.

## Final Risk Categorization

Based on the aggregated weight of the evidence, particularly the severity, systematic nature, and ongoing status of the conduct-based risks, Saab AB is assigned the following final risk category:

**Final Risk Category: 1 - Exclusion Candidate**

## Section II: Corporate Profile and Market Position

### Corporate Structure and Operations

Saab AB is a prominent Swedish defense and security company founded in 1937, with a mission to "keep people and society safe".<sup>1</sup> It operates globally, serving governments, authorities, and corporations with a wide range of products and services.<sup>3</sup> The company's operations are structured into several core business areas, reflecting its diverse technological

capabilities <sup>4</sup>:

- **Aeronautics:** Responsible for the development, production, and support of the JAS 39 Gripen multi-role fighter aircraft, as well as Unmanned Aerial Systems (UAS) and aerostructures for both military and commercial clients.<sup>4</sup>
- **Dynamics:** Offers a broad portfolio of ground combat weapons, missile systems, torpedoes, and unmanned underwater vehicles. Key products include the Carl-Gustaf multi-role weapon system, the AT4 anti-armor weapon, and the NLAW (Next generation Light Anti-tank Weapon).<sup>4</sup>
- **Surveillance:** Provides airborne, land-based, and naval surveillance solutions, including the GlobalEye AEW&C system, the Erieye radar, the Giraffe radar family, and electronic warfare systems.<sup>4</sup>
- **Kockums:** Specializes in the naval domain, with a focus on submarines and surface warships.<sup>5</sup>

Military equipment and services constitute the overwhelming majority of the company's business, accounting for 83% of its sales. In 2022, Saab was ranked as the world's 39th largest arms-producing company by revenue.<sup>9</sup>

## Strategic Importance and Customer Base

Saab competes in a global market, which necessitates a strong international presence.<sup>4</sup> The company has established market areas covering Europe, North and South America, the Asia-Pacific region, and the Middle East.<sup>4</sup> Its customer base largely consists of public authorities and national governments.<sup>5</sup> This global footprint and reliance on government contracts are central to understanding the company's exposure to geopolitical and ethical risks associated with international arms transfers.

## Section III: Assessment Framework: The GPFG Ethical Guidelines

The analysis in this report is conducted strictly within the framework established by the *Guidelines for Observation and Exclusion of Companies from the Government Pension Fund Global*, issued by the Norwegian Ministry of Finance.<sup>12</sup>

## Purpose and Scope

The stated purpose of the guidelines is to avoid investments in companies that cause or contribute to serious violations of fundamental ethical norms as defined within the document.<sup>12</sup> The GPFG's Council on Ethics is tasked with evaluating companies against these criteria and providing recommendations to Norges Bank, which makes the final decision on observation or exclusion.<sup>13</sup>

## Relevant Product-Based Criteria (§3)

The product-based assessment focuses on §3(1)(a) of the guidelines. This criterion mandates that the Fund shall not be invested in companies that develop or produce weapons, or central components for such weapons, that "by normal use violate fundamental humanitarian principles." The guidelines explicitly name the following weapon types<sup>12</sup>:

- Biological and chemical weapons
- Nuclear weapons
- Non-detectable fragments
- Incendiary weapons and blinding laser weapons
- Anti-personnel mines and cluster munitions

## Relevant Conduct-Based Criteria (§4)

The conduct-based assessment is guided by §4, which allows for observation or exclusion where there is an "unacceptable risk that the company contributes to or is itself responsible for" specific norm violations. The criteria most relevant to the analysis of Saab AB are<sup>12</sup>:

- **§4b:** Serious violations of individuals' rights in war or conflict situations.
- **§4c:** Sale of weapons to states in armed conflicts that use the weapons in ways that constitute serious and systematic breaches of international law's rules for hostilities.
- **§4g:** Gross corruption or other gross economic crime.

The assessment of conduct-based risk considers the probability of future norm violations, the severity and scope of the violations, and the connection between the company's actions and

the norm breach.<sup>12</sup>

## Section IV: Product-Based Risk Assessment (§3 Criteria)

This section provides a systematic review of Saab AB's product portfolio against the specific prohibitions outlined in §3 of the GPFG ethical guidelines.

### Sub-Section 4.1: Cluster Munitions

A significant historical issue links Saab AB to the production of cluster munitions. A 2011 report by BankTrack, referencing the exclusion list of the Dutch pension fund manager PGGM, identified Saab AB as having been excluded for its involvement in "Cluster munitions".<sup>15</sup> At the time, PGGM's policy was to exclude companies with "substantial involvement" in the production or trade of such weapons or their essential components.<sup>15</sup> This finding establishes a serious historical allegation from a peer institutional investor with a robust ethical screening process.

However, an assessment of the *current* risk profile indicates a change in this situation. Comprehensive, recent reports from leading monitoring organizations, including PAX and the Cluster Munition Coalition (publishers of the Cluster Munition Monitor), do not list Saab AB among known current producers of cluster munitions.<sup>16</sup> Furthermore, Saab AB does not appear on the GPFG's own public list of companies excluded for involvement in cluster munitions production.<sup>14</sup>

This discrepancy between the historical exclusion by PGGM and the current consensus of monitoring bodies suggests that the activity that triggered the 2011 exclusion may have ceased, or the product in question was redefined or divested. The lack of public clarification from the company on this matter creates a transparency gap. While the direct product-based risk under this criterion is now assessed as low, the historical incident raises questions about the company's past governance and its willingness to operate in controversial product areas. This history is a relevant factor in a forward-looking risk assessment, particularly as new ethical challenges emerge in areas such as autonomous weapon systems.<sup>19</sup>

## Sub-Section 4.2: Nuclear Weapons and Components

A review of Saab's product portfolio reveals no evidence of direct involvement in the production of nuclear warheads or their "central components," as defined by the guidelines. The GPFG's exclusion list for nuclear weapons producers includes major aerospace and defense firms like BAE Systems, Boeing, and Lockheed Martin, but does not include Saab.<sup>14</sup> This indicates that neither the Council on Ethics nor Norges Bank has found sufficient evidence to warrant exclusion on these grounds.

## Sub-Section 4.3: Other Prohibited Weapons (Anti-Personnel Mines, etc.)

There is no evidence in the available research to suggest that Saab AB produces anti-personnel mines, incendiary weapons, blinding laser weapons, or other weapon types explicitly banned under §3(1)(a). The company's ground combat systems, such as the Carl-Gustaf, AT4, and NLAW, are designed as anti-armor or multi-role weapon systems and do not fall within the definitions of these prohibited categories.<sup>7</sup>

**Table 1: Saab AB Product Portfolio vs. GPFG §3 Prohibitions**

Prohibited Weapon Category (§3 Guideline)	Relevant Saab Products/Involvement	Assessment/Evidence
Cluster Munitions	Historical allegation of involvement in components.	Excluded by PGGM in 2011. <sup>15</sup> Not listed in current PAX or Cluster Munition Monitor reports. <sup>17</sup> Risk assessed as historical/low.
Nuclear Weapons	No known involvement.	Not listed on the GPFG exclusion list for nuclear weapons producers. <sup>14</sup> No

		evidence of development of central components.
Anti-Personnel Mines	No known involvement.	Product portfolio does not include anti-personnel mines. <sup>7</sup>
Incendiary/Blinding Weapons	No known involvement.	Product portfolio does not include these weapon types. <sup>7</sup>
Biological/Chemical Weapons	No known involvement.	No evidence of production or development in these areas.

## Section V: Conduct-Based and Geopolitical Risk Assessment (§4 Criteria)

This section presents the core findings of the risk assessment, detailing a pattern of corporate conduct and geopolitical exposure that raises significant and unacceptable risks under §4 of the GPFG guidelines.

### Sub-Section 5.1: Gross Corruption or Other Gross Economic Crime (§4g)

The analysis reveals a recurring pattern of credible allegations of corruption related to Saab's efforts to secure major international contracts for its flagship Gripen fighter aircraft. These are not isolated incidents but span decades and multiple jurisdictions, suggesting a potential systemic weakness in the company's anti-corruption governance.

#### Case Study 1: The South African Arms Deal (1999-Present)

In 1999, Saab, in a joint venture with BAE Systems, secured a contract to supply Gripen fighter jets to South Africa.<sup>22</sup> The deal was immediately mired in allegations of widespread bribery. The most critical piece of evidence emerged in June 2011, when Saab itself announced that an internal investigation had revealed evidence of corrupt practices by its partner, BAE Systems.<sup>23</sup> Saab admitted that payments of 24 million rand (approximately £1.3 million at the time) had been made to a South African consultant to help secure the contract.<sup>2</sup>

The primary national accountability mechanism, the Seriti Commission of Inquiry, failed to address these issues meaningfully. The commission was widely condemned by civil society as a "whitewash" designed to conceal rather than expose corruption.<sup>24</sup> In 2019, its findings, which had exonerated all parties, were set aside by the South African High Court, which ruled that the commission had "failed manifestly to enquire into key issues".<sup>25</sup> This judicial rebuke underscores the complete failure of local accountability and leaves the full extent of the corruption unaddressed. This case establishes a clear, historical instance of conduct aligning with the "gross corruption" criterion, with an admission of payments and a corrupted official inquiry.

## **Case Study 2: The Brazilian Gripen Deal and the U.S. DOJ Investigation (2014-Present)**

Fifteen years after the South African deal, Saab secured a \$5.4 billion contract in 2014 to supply 36 Gripen fighters to Brazil.<sup>27</sup> This deal also became the subject of corruption allegations, with Brazilian prosecutors accusing former President Luiz Inácio Lula da Silva of using his influence to favor Saab in exchange for payments.<sup>2</sup> While previous investigations by Swedish and Brazilian authorities were closed without finding wrongdoing by Saab, a far more significant development has superseded these outcomes.<sup>29</sup>

On October 10, 2024, Saab announced that its U.S. subsidiary, Saab North America, Inc., had received a subpoena from the U.S. Department of Justice (DOJ) requesting information about the Brazil deal.<sup>29</sup> This investigation is being conducted under the Foreign Corrupt Practices Act (FCPA), a powerful statute with extraterritorial reach that allows U.S. authorities to prosecute bribery of foreign officials.<sup>32</sup> An active FCPA investigation by the DOJ is a highly material event, signifying that a credible and well-resourced legal authority has determined there is sufficient cause to investigate potential bribery. This elevates the risk from a historical allegation to a clear, present, and high-impact legal and ethical liability for Saab.

The recurrence of such serious allegations in two of the company's largest export contracts suggests that its internal controls and due diligence processes for high-risk markets may be inadequate. This pattern indicates an unacceptable risk of both past and future norm



violations under §4g.

## **Sub-Section 5.2: Sales to States in Armed Conflict (§4b & §4c)**

Saab's sales portfolio demonstrates a willingness to supply advanced military systems to states actively involved in armed conflicts characterized by severe human rights violations, creating an unacceptable risk under §4c of the guidelines.

### **Geopolitical Exposure 1: The United Arab Emirates and the Conflict in Yemen**

Saab maintains a deep, long-term, and high-value military partnership with the United Arab Emirates. This includes a 2015 deal for GlobalEye AEW&C aircraft worth \$1.27 billion, a follow-on contract in 2021 for an additional \$1.018 billion, and an ongoing in-service support contract signed in 2024 for \$190 million.<sup>34</sup>

These sales have occurred concurrently with the UAE's role as a principal member of the Saudi-led coalition that intervened in the Yemen armed conflict in March 2015. Reports from Human Rights Watch and Amnesty International have consistently documented that this conflict has created one of the world's worst humanitarian crises.<sup>37</sup> These organizations have credibly accused the coalition of widespread and systematic violations of international humanitarian law, including unlawful airstrikes targeting homes, markets, and hospitals; attacks on food and water infrastructure; and imposing a blockade that has contributed to famine conditions.<sup>40</sup>

The GlobalEye system is an advanced surveillance, command, and control platform—a "force multiplier" that provides its operator with superior situational awareness and the ability to direct air and naval operations. Providing this technology to a state actively engaged in a conflict where systematic IHL violations are being committed constitutes a direct contribution to that state's capacity to wage war. It directly enables the very military campaign in which these violations occur. A Saab spokesperson acknowledged the system's military utility and confirmed that the UAE's participation in the Yemen war was "not an obstacle to the deal," indicating a conscious decision to supply the system despite the well-documented context of the conflict.<sup>45</sup> This conduct presents an unacceptable risk under §4c: the sale of weapons to a state in an armed conflict that is using them in ways that constitute serious and systematic breaches of international law.

Geopolitical Exposure 2: Other High-Risk End-Users

Saab's pattern of sales into volatile regions is further evidenced by other contracts:

- **Pakistan:** The sale of Erieye AEW&C systems to Pakistan, a state engaged in a long-running conflict with India, has seen these systems actively used in military clashes, such as the 2019 Balakot crisis.<sup>46</sup>
- **Thailand:** The use of Saab-made Gripen fighters by the Royal Thai Air Force in airstrikes against Cambodia reportedly led the Swedish government to reconsider further sales, demonstrating that even Saab's home country has recognized the risks associated with its customers' conduct under its own strict export laws.<sup>48</sup>

Sub-Section 5.3: Evaluation of Corporate Governance and Mitigation Efforts

Saab publicly states a commitment to ethical conduct, export compliance, and human rights.<sup>1</sup> However, there is a significant gap between these stated policies and the pattern of conduct identified in this assessment. The recurring allegations of corruption and the decision to supply a key military enabling technology to the UAE for its campaign in Yemen suggest that the company's ethical and compliance frameworks are insufficient to prevent its involvement in activities that create an unacceptable risk under the GPFG guidelines.

Table 2: Summary of Conduct-Based Risk Factors (§4)

Risk Area	Relevant GPFG Guideline	Key Evidence & Allegations	Current Status	Assessed Risk Level
Corruption (South Africa)	§4g	Admission of payments to consultant via BAE Systems. <sup>2</sup>	Historical (admission made, but accountability	High

		Official inquiry (Seriti Commission) discredited and findings set aside by High Court. <sup>24</sup>	failed).	
<b>Corruption (Brazil)</b>	§4g	Allegations of bribery to influence 2014 Gripen contract. <sup>2</sup> Active investigation by U.S. Department of Justice under the FCPA initiated in Oct 2024. <sup>29</sup>	Active/Ongoing Investigation.	High
<b>Sales in Conflict (UAE/Yemen)</b>	§4c, §4b	Sale of GlobalEye AEW&C systems. <sup>34</sup> UAE is a principal party in the Yemen conflict, where systematic IHL violations by its coalition are documented by HRW and Amnesty. <sup>37</sup>	Ongoing Military Relationship.	High

## Section VI: Integrated Risk Synthesis and Final Recommendation

## Consolidated Risk Profile

The synthesis of the preceding analysis reveals a stark contrast between the company's product-based and conduct-based risk profiles.

- The **product-based risks** under §3 are assessed as low. While a historical allegation regarding cluster munitions raises governance questions, there is no conclusive evidence of current production of weapons explicitly prohibited by the guidelines.
- The **conduct-based risks** under §4 are assessed as severe, current, and systematic. The pattern of alleged corruption in major contracts, now subject to an active U.S. DOJ investigation, presents an unacceptable risk under the "gross corruption" criterion (§4g). Simultaneously, the sale and ongoing support of a critical military enabling technology to the UAE, a primary actor in the devastating Yemen conflict, presents an unacceptable risk of contributing to "serious and systematic breaches" of international humanitarian law (§4c).

## Likelihood of Future Norm Violations

The GPFG guidelines are forward-looking, focused on the "unacceptable risk" of future violations. The evidence presented indicates a high probability of such future violations. The combination of a recurring pattern of alleged corruption in high-stakes deals, a demonstrated willingness to supply advanced military systems into one of the world's most severe humanitarian crises, and a significant gap between stated ethical policy and actual corporate practice suggests that the company's governance and due diligence frameworks are insufficient to mitigate these fundamental risks.

## Justification for Final Risk Categorization

The conclusion that Saab AB represents an unacceptable investment risk for the GPFG is based on the aggregated evidence of its conduct. The severity and ongoing nature of the risks are dispositive. An active FCPA investigation by the U.S. DOJ into one of the company's largest-ever contracts is a material event that cannot be overlooked. Likewise, the direct,

knowing, and ongoing contribution to the military capabilities of a state engaged in a conflict characterized by systematic violations of international humanitarian law is a clear breach of the ethical norms the GPFG seeks to uphold.

## Final Recommendation

Based on the comprehensive analysis, it is concluded that there is an unacceptable risk that Saab AB contributes to, and is responsible for, multiple serious violations of the fundamental ethical norms outlined in §4 of the guidelines. Therefore, the following final risk category is recommended:

### Final Risk Category: 1 - Exclusion Candidate

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