

Anti-corruption and bribery policy



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INTRODUCTION

EG operates its business without resorting to corruption. EG complies with the applicable anti-corruption laws in the countries in which EG operates and does not accept corruption. This anti-corruption policy reflects EG's desire to maintain the highest standards of the company's integrity and ethics in relation to the way in which EG operates its business and among EG's employees.

SCOPE OF APPLICATION

The policy applies to all employees in the EG group. For an overview of the EG group, please see a list [here](#).

DEFINITIONS

"Corruption" is defined as the misuse of entrusted power for own personal gain.

The word "own" must be understood broadly. This may include yourself, but also other related and natural and legal persons, for example EG. Similarly, the word "gain" shall also be understood to include money, gifts, benefits and other assets, etc.

In this policy, the "EG group" is referred to as the company, the EG group or EG.

POLICY STATEMENT

Corruption can take many forms, including bribery, which is a criminal offence.



Corruption in the form of bribery is to offer, promise or receive money, a gift or other advantage where the motivation and intention of the giver is to gain an unjustified advantage. This could be with a view to receiving positive special treatment, a special benefit, shorter case handling times or other benefits.

Employees must be aware that gifts and hospitality can be used as a mean to promote corruption, or that they could be perceived by others as corruption.

Gifts

A gift is an item or money that is given away without a return benefit. However, a gift can - regardless of form and value - leave the recipient with the impression that the gift comes with an obligation. In this way, the giver risks being suspected of influencing the recipient to provide a return benefit.

Gifts must be understood broadly and in this context can be:



- Cash or shares
- Donations to political parties and charities
- Benefits, including discounts

To avoid misunderstandings or suspicion of misconduct, employees must not request gifts and other benefits from customers, suppliers or partners.

Employees may accept or give gifts if the following conditions are met:

- Gifts may not in any and all situations exceed a total value of DKK 500 for either the sender or the recipient
- Individual gifts may only be given and received in connection with special occasions, such as an anniversary/retirement or a "round-number" birthday
- Joint gifts to an entire department or team may only be accepted on special occasions such as holidays and special events in connection with projects. This includes individual gifts that are shared with a department.

In special cases where EG gives or receives gifts exceeding the threshold of DKK 500, the gift and amount must be approved by the immediate manager and EG's Compliance function.

Information about date, recipient, value of the gift and reason must be reported to Group Legal & Compliance (compliance@eg.dk). Further handling of such cases will be assessed against the intent of this policy.

Hospitality



Ordinary hospitality for business purposes will typically be an invitation to lunch or dinner. Employees can accept and offer customary hospitality for business purposes, i.e. with a specific academic purpose and content that is not extravagant in nature. Limitation of costs for the reimbursement of expenses for such meals and policy for expenses can be found in the Delegation of Authority

In exceptional cases and only in connection with a professional event, other types of hospitality can be granted, e.g. invitations to conferences, hotel stays, flights and tickets to sports or entertainment events. If an employee wishes to offer or receive this form of hospitality and treatment, this requires prior approval from the immediate manager, who does not participate in the event and EG's Compliance function, cf. above.

Courses, events and excursions can in many cases be perceived as a gift. Therefore, courses, events and excursions must have predominantly professional content in order not to have tax consequences for the recipient and not to be regarded as a gift. It is therefore essential that the participants are selected on the basis of objective and transparent criteria.

CONFLICT OF INTERESTS

A conflict of interest arises when an employee has a private interest that potentially affects the result of a decision or the performance of their tasks at EG. EG employees must avoid conflicts between their own personal interests and EG's interests.



Private interests are benefits for yourself or one's family, relatives, friends or a company or organisation with which one has or has had a close professional or political affiliation.

Employees must avoid favouring family or friends and thereby giving them advantageous treatment due to a close relationship, as opposed to a professional and objective assessment of the person's abilities and professional qualities. Before you enter into an agreement with or employ such persons, you must consult with your manager.

REPORTING OF CORRUPTION

Corruption or suspicion of corruption involving the EG group or its employees, including members of the board of directors and the executive board or other persons representing EG, must be reported immediately to EG.

Reporting can be done using the normal communication channels, by notifying a manager or supervisor, or by submitting a report via the whistleblower scheme. If the whistleblower scheme is used, the whistleblower may choose to report anonymously or provide their name. Further information about the reporting tool can be found in the whistleblower scheme.



In the event of confirmed or suspected cases of corruption, e.g. bribery, EG decides whether the case should be reported to the authorities.

Employees can also pose questions and concerns about specific behaviour to a manager.

COMPLIANCE

In addition to the ethical considerations, non-compliance with the anti-corruption policy may have legal consequences in relation to, among other things, procurement legislation, employment conditions and criminal liability for both the employee and EG.

Consequences in connection with the Public Procurement Act

Where, in connection with a tender, a candidate or tenderer has been convicted or fined by final judgment for bribery, the public sector customer may exclude the candidate or tenderer from participating in the tender in question.

Consequences in terms of employment rights

If an employee does not comply with this anti-corruption policy, this may have consequences for the conditions of their employment at EG.

Consequences in terms of criminal liability

Bribery, embezzlement, fraud, fraud of mandate and misconduct are criminal offences. Failure to comply with national legislation in this area may result in imprisonment for the employee and fines for both the employee and EG.

