

Anti-corruption and Bribery Policy



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1 INTRODUCTION

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

1.1 APPLICABILITY

The policy applies to all staff working for EG, its associated companies, as well as future acquisitions. For a list of EG and its associated companies, please see a list [here](#).

1.2 DEFINITIONS

Corruption is defined as an abuse of entrusted power for one's own personal or company gain.

EG and its associated companies can hereafter be references to as the company, the EG group or EG.

2 POLICY STATEMENT



Corruption can assume many forms, but is best known as bribery and is a criminal offence. Corruption in the form of bribery is offering, promising or accepting money, a gift or other benefit where the motivation and the intention of the giver is to obtain an advantage. This could be with the intent to receive positive special treatment, a special service, shorter case handling time or other advantages.

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

Gifts

Gifts constitute corruption. When a gift is offered, given, requested or received with an expectation of getting a favor in return and is consequently capable of influencing the receiver in the performance of a function or duties. Gifts could be (but not limited to):



- cash or shares
- political and charitable donations
- occasional gifts (e.g. for an anniversary, birthday or Christmas)

To avoid misunderstandings or suspicion of misconduct, employees may not accept, give or request gifts or other benefits.

Hospitality



Customary hospitality for business purposes would typically be an invitation to lunch or dinner. Employees can accept and offer customary hospitality for business purposes, that is with an actual specific professional purpose and content that is not of an extravagant nature. Please see Delegation of Authority for expense limits for cover charges for such a meal and Expense Policy for how to submit expenses.

In exceptional cases, other types of hospitality, for example invitations to conferences, hotel stays, flights and tickets to sports or entertainment events may be granted. If an employee wishes to offer this type of hospitality and treatment, it requires approval from immediate manager, who is not participating in the event, before planning and paying..

2.1 CONFLICT OF INTERESTS

A conflict of interest occurs when an employee has a private interest that could potentially influence the outcome of a decision or the performance of their duties at EG. Employees at EG must avoid conflicts between their own, personal interests and the interests of EG.



Private interests are benefits to oneself or one's family, relatives, friends or a business or organization which one has or has had a close professional or political affiliation to.

Employees must avoid favoring family or friends and thus giving them preferential treatment due to a close relationship, as opposed to a professional and objective assessment of the person in question's abilities and professional qualities. Before entering into an agreement with or the hiring of these people, an employee must seek advice from their manager.

2.2 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 people who represent EG must be reported to EG immediately.

Reporting can be done by using the normal communication channels, notifying a manager or supervisor, or by submitting a report through the Whistleblower scheme. If the Whistleblower scheme is used, the whistleblower can choose to submit a report anonymously or disclose their name. More 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 will decide whether to report the matter to authorities.

Employees can direct questions and concerns about specific behavior towards a manager.

3 COMPLIANCE

Besides the ethical considerations, a failure to observe the anti-corruption policy can have legal consequences in terms of procurement law, employment and criminal liability for both the employee and EG.

Consequences in terms of public procurement law

If an applicant or tenderer, in connection with a tender, has been the subject of a conviction or fine by final judgement for bribery, the customer can exclude the applicant or tenderer from participation in a tendering procedure. In general, the applicant or tenderer is excluded from participating in tendering procedures for four years.

Consequences in terms of employment rights

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



Consequences in terms of criminal liability

Corruption is also criminalized in the penal code in the form of e.g. bribery, blackmail, embezzlement and fraud. Failure to comply with the provisions in the penal code can lead to a prison sentence for the employee as well as a fine for both the employee and EG.