



Anti-corruption policy

Corruption and bribery are illegal and unacceptable activities which undermine a sound, democratic and competitive development of society in Denmark and abroad, discredit the name of the company and destroy business opportunities.

As an international contracting group, Aarsleff works in many different countries with diverse cultures and different religious and political convictions. This anti-corruption policy sets out how the Aarsleff Group addresses the determined rules for anticorruption and conflicts of interests.

We will not accept or give bribery in any form. Bribery means any offer or acceptance of a gift, fee, remuneration, reward or similar to or from another person as an incentive to influence or promote a certain act or omission. Kickbacks are also considered bribery. Bribery may take place directly or indirectly, e.g. by means of intermediaries (agents, consultants, subsuppliers or similar).

The prohibition against bribery comprises any transfer of values or assets and is not restricted to transfer of money.

The prohibition also comprises:

- Charitable donations
- Payment of travel expenses
- Supply of goods and services
- Disproportionately high costs for entertainment
- Other personal or financial advantages.

Bribery is prohibited in all countries where we have activities. The prohibition against bribery applies without exception, also if our competitors are using bribery. The principles do not prohibit giving and receiving normal and reasonable hospitality.

In some cases, facilitation payments are allowed. It may be difficult to distinguish between facilitation payments and illegal bribery, kickbacks etc. Generally speaking, bribery is the offering of something to another person for the purpose of making them do, avoid to do, make a decision or change their opinion on an issue, whereas facilitation payments are payments which do not change the actions of a third party but which are given to increase the speed at which they do their job.

If a facilitation payment is deemed strictly necessary in a given situation, any such payment may only be made in accordance with the following guidelines:

- The payment may not be intended to influence or change any decisions made by a public official.
- The amount paid must be modest in amount, and the sole purpose of the payment must be to expedite the performance of a routine action.
- Details of the payment must be duly recorded and include the purpose, the name and occupation of the recipient.



See also Policy 3.04 Activities with customers and collaboration partners.

A stylized, handwritten signature in black ink, consisting of a large, sweeping 'J' followed by a horizontal line and a small flourish.

Jesper Kristian Jacobsen
CEO

A handwritten signature in black ink, appearing to read 'Lars M C' with a long, horizontal flourish extending to the right.

Lars M. Carlsen
Deputy CEO

A handwritten signature in black ink, appearing to read 'Mogens Vedel Hestbæk' in a cursive style.

Mogens Vedel Hestbæk
Group CFO