



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.

The prohibition also applies to facilitation payments

We do not offer or accept any form of facilitation payments. Facilitation payments are typically small unofficial cash payments (monetary or in the form of goods of any type) made to secure or expedite the performance of a routine or necessary action (e.g. by a public official). We must avoid any type of activity which may imply that a facilitation payment is accepted by us or on behalf of us, or which may indicate that such payment will be made or accepted.

If an employee is requested to make a payment on behalf of Aarsleff, the employee must always be aware of what the payment covers and whether the requested amount is in a reasonable proportion to the goods or services supplied. Employees should always ask for a receipt which describes the reason for the payment. Any employee who has suspicions, concerns or inquiries about a payment should raise these by contacting the manager of Aarsleff's legal department or by using the whistleblower scheme. Aarsleff can and want to help employees to resist any type of pressure concerning participation in any type of activity in connection with facilitation payments.

See also policy 3.04 Activities with participation of customers and business partners.

The Executive Management