

## Group policy on anti-corruption

As an international contracting group, Aarsleff collaborates with partners in numerous countries and cultures. To ensure integrity and responsibility in all relationships, we have a clear policy on how employees and companies should handle rules on anti-corruption and conflicts of interest.

The Aarsleff Group is committed to complying with applicable anti-corruption legislation and has a zero-tolerance policy towards all forms of corruption and corruption-like practices. We work actively to prevent, detect and eliminate corruption in any form.

### Corruption and bribery

We do not tolerate any form of corruption or bribery. Corruption includes abuse of entrusted power, embezzlement, kickbacks, extortion, fraud, nepotism, favouritism, bribery and facilitation payments. Corruption can damage legitimate business activities, distort competition, undermine trust and expose both companies and individuals to significant risk.

Corruption does not necessarily involve money. It may also consist of services or benefits provided in order to obtain preferential treatment, protection, additional services or faster case processing.

Employees must not offer, receive or accept any form of bribery. This applies to all forms of value transfer – including gifts, fees, donations, travel expenses, goods, services, excessive entertainment and other personal or financial benefits. Kickbacks are also considered bribery.

Bribery is prohibited, whether direct or indirect – e.g. via agents, consultants, subcontractors or other intermediaries. Facilitation payments are also not permitted.

The prohibition applies in all countries where the Aarsleff Group operates – without exceptions, even in cases where competitors may use such methods. However, normal and appropriate hospitality is permitted when it is in accordance with the respective Aarsleff companies' rules for entertainment.

### Facility payments

Aarsleff does not make or accept facilitation payments. These are typically small, unofficial payments made to expedite a routine or necessary action – e.g. from a public official.

Employees must always ensure that payments on behalf of the Group are reasonable and documented. A receipt stating the purpose must always be obtained. In case of doubt or suspicion, employees should contact the head of Group Law or use the whistleblower system. Aarsleff supports the employees in resisting pressure to participate in activities involving facilitation payments.

### Gifts, entertainment and events

The line between acceptable and unacceptable actions is whether a gesture has a clear work-related purpose or whether it appears to be for personal gain.

We wish to avoid any situation where our impartiality could be called into question. All decisions must be made loyally and independently – with the Group's interests in mind. The policy on anti-corruption thus applies to initiatives from both Aarsleff and external collaboration partners to employees of the Aarsleff Group.

- **Gifts:** In principle, you are not allowed to give or receive gifts – including entertainment. Exceptions apply only to modest gifts on occasions such as anniversaries and milestone birthdays. Public customers may have special and stringent rules, which we respect.
- **Lunch or dinner invitations:** Participation is only permitted when there is a written agenda with professional content and when a written summary is subsequently provided to the participants. Expenses for restaurant visits must also comply with the respective Aarsleff companies' rules for entertainment.
- **Seminars, courses and study trips:** Participation requires a clear professional purpose. As a general rule, participants pay for their own transport, accommodation and meals when attending invitations. Family members and relatives do not participate in customer events.

### Conflicts of interest and bias

Employees must avoid real and potential conflicts between private interests and the Group's interests. We refer to the sections on secondary employment and the prevention of conflicts of interest and bias, which can be found in the employee handbooks and on the Group's intranet under My Employment.

### Preventive measures

- **Ethical code of conduct for collaboration partners:** Included as an appendix to delivery and subcontractor agreements and contains requirements regarding anti-corruption. Collaboration partners who do not meet the requirements may be excluded from future collaboration.
- **Ethical code of conduct for employees:** All employees are obliged to comply with the Group's ethical code of conduct, including zero tolerance for corruption.
- **Education and training:** Employees regularly participate in e-learning and other anti-corruption training.
- **Risk assessment:** The Group's largest collaboration partners are continuously evaluated based on a number of risk factors – including the risk of corruption.

### Follow-up and monitoring

All employees are obliged to report any suspicion of corruption to their immediate manager or via the whistleblower scheme. Group Procurement conducts regular spot checks to ensure that collaboration partners comply with the Group's policies and standards.