

# Anti-corruption and bribery policy

## 1. Object and scope of application

The object of this policy is to set out the general guidelines for how the bank should work to prevent and combat corruption and bribery.

The policy also ensures and promotes conduct and work ethics among the bank's employees, which must be characterised by a high standard of personal and organisational integrity - both internally and externally in their interaction with the bank's various stakeholders.

In accordance with the bank's values, code of conduct and commitment to the UN Global Compact, including the anti-corruption principle, the bank has zero tolerance for, and endeavours to combat, corruption and bribery in all their forms. This applies in relation to authorities, business partners and customers.

The bank's anti-corruption and bribery policy applies to all of the bank's employees. Any violation of the rules will be dealt with internally and if necessary reported to the relevant authorities.

## 2. Anti-corruption and bribery procedures

In accordance with the concept of corruption referred to in the Danish Penal Code and the international anti-corruption conventions, including the UN Convention against Corruption, corruption is defined as the abuse of entrusted power for private gain.

Corruption takes many forms including via conflicts of interest, bribery, extortion, fraud and private treaty (see the definitions in section 6 of this policy) which induce someone to act illegally, or illegally to refrain from action, in breach of their duties.

Under the rules against corruption and bribery applies among other things, that the bank and its employees may neither accept nor offer any bribes, and employees may neither offer nor accept gifts of more than token value.

In addition, an employee who is offered a bribe, or is aware that a colleague has been offered a bribe, must always report this offer at once to their immediate superior, to the bank's HR department or to the bank's division for operational risk and anti-money laundering.

Employees involved in bribery or other forms of corruption may be prosecuted and held personally responsible, and legal consequences will be imposed under employment law.

It can sometimes be challenging to distinguish between right and wrong due to the circumstances, cultural differences etc. If in doubt, employees must therefore always contact their immediate superior or the bank's HR department or compliance function.

The bank's employees also have access to the bank's statutory whistleblower scheme via the bank's intranet. All employees can use the whistleblower scheme (including anonymously) to report incidents of violations and potential violations of applicable law or the bank's internal guidelines.

The head of the HR department (or, if the report was made via the bank's internal whistleblower scheme, the authorised individual) will pursue and investigate incidents relating to corporate conduct, including corruption and bribery cases.

The individual/department in charge of the investigation will immediately examine the incident and must be independent of the person/department under investigation. Should a state of dependency arise between the parties, mitigating actions will be initiated.

### **3. Prevention and efforts to combat corruption and bribery**

The bank has implemented a number of efforts to ensure that the bank's employees are not exposed to and do not participate in corruption or bribery.

The bank's efforts to combat corruption and bribery are anchored in this anti-corruption and bribery policy and in a range of the bank's other policies and principles which support a high standard of proper behaviour and integrity in the interaction with customers, authorities and business partners. These policies etc. include:

- Code of conduct
- Employee handbook
- Policy for a sound corporate culture
- Responsible purchasing policy

The above policies etc. are available to all employees on the bank's intranet. The policies (except the employee handbook) are also available externally on the bank's website.

The bank's employees are required regularly and at least annually to read the bank's code of conduct and confirm that they understand its contents. The code of conduct includes the abovementioned principles and procedures for preventing and combating corruption and bribery. This minimum annual refresher requirement helps to keep the bank's employees up to date in this area, in which they also receive relevant training.

### **4. Compliance and reporting**

The bank continuously supervises compliance with the applicable rules.

The board of directors and general management will be informed of any incidents of violation of the provisions of this policy and the consequences of such violations.

## 5. Updating

The bank's board of directors must review the bank's anti-corruption and bribery policy at least once a year to assess the need for changes, and any changes must be approved by the bank's board of directors.

## 6. Definitions

- **Conflicts of interest** (including nepotism): Conflicts of interest arise from situations in which an employee has a private interest that could potentially influence and/or actually does influence the impartial and objective performance of their work-related tasks. When faced with a potential and/or actual conflict of interest, the employee is required to immediately report it in accordance with section 2 of this policy.
- **Bribery**: Bribery is the act of offering, giving, promising, receiving, soliciting or accepting something of value with the purpose of influencing the performance of work-related tasks.
- **Extortion**: Extortion occurs when threats of harm are made to a person, their property or next of kin/related parties for the purpose of obtaining undue gain.
- **Fraud** (including anti-competition): Fraud occurs when a person uses dishonest or misleading conduct to obtain a given advantage for themselves.
- **Private treaty** (collusion): Private treaty occurs when several individuals enter into a secret agreement to obtain financial gain or a certain conduct from others who are not party to the agreement.

*Adopted by the board of directors on 18 September 2024.*