



Danish Crown

Anti-Corruption Compliance Policy

Governance	
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1. Our policy

1.1 Our commitment

The management of Danish Crown is strongly committed to ensure the Group's compliance with the anti-corruption and -bribery laws in force. This commitment is part of our general commitment as a responsible group to act with integrity and to satisfy the requirements of the laws in force in the countries in which we operate.

Our commitment to fighting corruption in all its forms is a shared responsibility and each of us is required to understand our joint responsibility to conduct our business in a way that is consistent with our values and in accordance with this policy.

1.2 Our culture

In Danish Crown we support a compliance culture and provide the necessary guidance and mandatory training to all relevant employees. In this way, we ensure that all relevant employees have a strong awareness of the rules and the ability to comply with the guidance provided.

We actively promote a culture where "playing by the rules is business as usual" and urge employees to raise compliance issues openly.

1.3 Our duties to promote compliance

An infringement of anti-corruption and -bribery laws could have serious consequences for Danish Crown and the individual involved.

To prevent a violation all employees must be aware of the following obligations:

- a) All employees are expected to contribute actively to complying with the anti-corruption and -bribery laws in force;
- b) No employee should assume that Danish Crown's interests ever require anything other than compliance with the rules;
- c) No one has authority to give any order or direction that would result in a violation of the rules;

- d) Every employee is obliged to seek advice and guidance from his/ her direct line manager and/or the Group General Counsel if in doubt; and
- e) Any violation or suspected violation must be reported immediately to the Group General Counsel. It is also possible to report a concern in the Danish Crown Whistleblower Scheme.

1.4 Globally consistent high standards

This policy is applicable in all jurisdictions in which we operate, even if local law is more lenient. Our policy reflects the need for globally consistent and high standards to demonstrate our commitment to conduct our business in a way that is consistent with our values, regardless of the jurisdiction.

1.5 Disclosure Management System

Danish Crown has a Disclosure Management System requiring all employees to disclose gifts, hospitality, travel expenses, conflict of interest, donations, and facilitation payments in accordance with this policy the following related standards: Standard on Gifts, hospitality, and travel expenses, Standard on Facilitation payments and small bribes and Standard on Conflict of interest. The Disclosure Management System can be accessed by all employees through Danish Crown Intranet. The disclosure of an incident does not determine if the incident is appropriate or inappropriate but ensures transparency. The Group CFO monitors the disclosure on a regular basis and will determine if further investigation of the reported incident is required.

1.6 Disciplinary measures

Danish Crown will respond to an incident of corruption consistently and with appropriate measures. Any employee found to be in violation of this policy or any of the related standards will be subject to appropriate disciplinary sanctions.



2. Corruption

2.1 Corruption is never acceptable

In Danish Crown we do not tolerate corrupt behaviour of any kind in any jurisdiction in which we operate. Corruption is against the law and offends our core values as a responsible group to act with integrity and in compliance with the applicable laws in the countries in which we operate.

Corruption is generally defined as "the abuse of a position or an office to obtain private gain". Corrupt behaviour includes, among other things, bribery, extortion, facilitation payments, kickbacks, trading in influence, nepotism (preferential treatment of one's relatives or friends), etc. Below you will find examples of corrupt behaviour and instructions on how to manage any such incident.

2.1.1 Bribes and improper advantages

In Danish Crown we do not offer, give, or accept bribes or any form of improper advantage, and we do not allow others to give bribes on our behalf.

Bribery occurs when you give or receive an item of value (money or favour) and, thereby, are expected to give or receive improper advantages in return, i.e., a benefit you are not automatically entitled to or advantages which cannot be obtained honestly and legally.

Bribes and improper advantages can be in the form of cash or cash equivalents (such as coupons or rebates), but also cheap rent, valuable or frequent gifts, hospitality such as tickets to sporting or cultural events, favours or "pulling strings", increased revenue for a family business, etc. Bribery is basically anything of personal or commercial value to the receiver.

Both giving and receiving a bribe, or an improper advantage is prohibited. If you become aware of an incident of bribery this must be immediately reported to your manager, to Group Legal or to the Danish Crown Whistleblower Scheme.

In Danish Crown no employee will be penalized or dismissed for refusing to pay a bribe, even if it results in Danish Crown losing a business opportunity.

Gifts and hospitality

Personal advantages such as gifts, hospitality, etc. can under certain circumstances be seen or used as a cover for bribes or improper advantages. This includes advantages offered or received in everyday relations and interactions with business partners, suppliers, customers, public officials, etc.

In Danish Crown we do not give or accept gifts or hospitality that could question our integrity.

All gifts and hospitality above the threshold set out in the Danish Crown Standard on gifts, hospitality, and travel expenses must be approved by direct line manager and disclosed in Danish Crown's Disclosure Management System.

Travel expenses

In Danish Crown we always pay for our own travel and accommodation costs. We decline any offers or requests by Business Relation to pay or reimburse such expenses.

In Danish Crown, we as a general rule expect our Business Relations to pay their own travel and accommodation costs.

If we pay for a Business Relations travel expenses, it must be approved by direct line manager and disclosed in Danish Crown's Disclosure Management System.

Please see the Danish Crown Standard on gifts, hospitality, and travel expenses for further advice and guidance.

Donations and sponsorships

In Danish Crown we support contributions to the communities in which we do business and therefore Danish Crown permits reasonable donations to charities and sponsorships.

A donation must not qualify as a bribe or improper advantage and the grant of a donation may not be used as a means to improperly influence business decisions.

All donations must be approved by the direct line manager and disclosed in Danish Crown's Disclosure Management System.



Political contributions

In Danish Crown we do not give financial contributions to political parties, individuals, or candidates.

2.1.2 Facilitation payments

In Danish Crown we do not pay or use third parties to pay for facilitation.

Facilitation payments are small "grease" payments to enable or speed up a service you are entitled to without paying. Examples of facilitation payments are an extra payment to cross a boarder, to apply for official documents or registrations, or to obtain a visa or other kinds of approvals and permits.

Please see the Danish Crown Standard on Facilitation payments and small bribes for further advice and guidance.

If you are required to make a facilitation payment this must be disclosed in Danish Crown's Disclosure Management System.

2.1.3 Conflict of interest

In Danish Crown we expect all employees to act with objectivity and honesty.

A conflict of interest exists when an individual, who is responsible for acting in the best interests of Danish Crown, has another private interest or loyalty that could influence or impair, or may appear to influence or impair, the individual's ability to act in Danish Crown's best interests.

Please see Danish Crown Standard on Conflict of Interest for further advice and guidance.

You are required to disclose a conflict of interest in which you are directly involved in Danish Crown's Disclosure Management System.

If you become aware of a conflict of interest involving others, this may be reported to your manager, to Group Legal or to the Danish Crown Whistleblower Scheme.

2.2 Interactions with public authorities and public officials

In Danish Crown we interact with public authorities and officials respectfully, responsibly, and transparently. We do not give or offer anything of value to unduly influence a public authority or public official.

It may be permissible to make donations to a government agency (but not to an individual government official) as part of a charitable effort or to promote goodwill through actions such as providing free products for a government-sponsored event.

If you give or receive a donation to or from a government agency this must be approved by Group Legal and be disclosed in Danish Crown's Disclosure Management System.

2.3 Third Parties

As a part of doing business, Danish Crown may engage a third party (an independent legal entity or individual not employed by Danish Crown) to provide services or represent Danish Crown in interactions with public authorities and public officials.

Danish Crown is exposed to liability and reputational damage for any illegal or unethical behaviour conducted by such third party while acting on our behalf.

In Danish Crown we seek to ensure that third parties acting on behalf of Danish Crown share our values and (as a minimum) have the same compliance standards as we impose on ourselves.



3. Practical guidance

3.1 Practical guidelines on avoiding corrupt behaviour

In order to avoid corrupt behaviour you are instructed to follow the practical guidelines set out in the below Danish Crown Standards:

- A. Danish Crown Standard - gifts, hospitality, and travel expenses
- B. Danish Crown Standard - Facilitation payments and small bribes
- C. Danish Crown Standard – Conflict of interest

3.2 How to seek further advice

In Danish Crown we recognize that an open and honest dialogue is a precondition to maintain and continuously strengthen our integrity.

As an employee in Danish Crown, it is your right and responsibility to obtain guidance regarding any business decision you are uncertain about. The first point of contact for guidance should always be your direct line manager. If you are not comfortable with this, contact the Group General Counsel.

3.3 How to report a concern

A violation or suspected violation of this policy must be reported immediately to the Group General Counsel.

In Danish Crown we will not accept any retaliation against anyone who raises a concern in good faith. A good-faith report is one that you believe to be true and you do not make with the aim of harming others.

A concern may also be reported as a whistleblower report, as set out in section 3.4 below.

3.4 Danish Crown's Whistleblower Scheme

Danish Crown has established a Whistleblower Scheme for the reporting of any perceived or suspected illegal, unethical, or inappropriate conduct in relation to our business operations and the activities of our business partners, especially our suppliers.

The Whistleblower Scheme provides both employees and anyone outside our Group with a safe channel for raising a concern.

The Whistleblower Scheme is hosted by an independent third party, which allows for anonymous and confidential reporting in numerous languages, and which is compliant with all personal data protection regulations.

Information from our employees, suppliers and third parties helps us to identify violations and take appropriate action to protect human beings and the environment, and to avoid future violations.

Reports that are submitted via the above-mentioned channel are reviewed by a small group of authorized employees. Concerns received are investigated thoroughly and appropriate preventive or corrective actions are initiated, if necessary.

Our Whistleblower Scheme for reporting concerns and the related policy is available on our website (Whistleblower - Danish Crown).