



Software made for you



**ANTI-CORRUPTION AND ANTI-
BRIBERY POLICY- GLOBAL**

1. INTRODUCTION

EG operates its business without resorting to corruption. EG complies with the applicable anti-corruption laws in the countries in which EG operates and does not accept corruption. This anti-corruption policy reflects EG's commitment to upholding the highest standards of integrity and ethics in relation to the way in which EG operates its business and among its staff.

1.1. Applicability

The policy applies to all staff and consultants and/or contracting staff working in EG except for EGDK India Pvt Ltd which has a separate policy.

Please see the list of legal entities in EG on <https://egsoftware.com/global/about-us>

1.2. Definitions

In this policy "EG" shall also be referred to as the company.

Key terms and definitions can be found in the appendix, in section 5.1

2. POLICY STATEMENT

Corruption can take many forms, including bribery, which is a criminal offence.

Corruption in the form of bribery is to offer, promise or receive money, a gift or other advantage where the motivation and intention of the giver is to gain an unjustified advantage. This could be with a view to receiving positive special treatment, a special benefit, shorter case handling times or other benefits.

Staff must be aware that gifts and hospitality can be used as a means to promote corruption, or that they could be perceived by others as corruption.

2.1. Gifts

A gift is an item or money that is given away without a return benefit. However, a gift can - regardless of form and value - leave the recipient with the impression that the gift comes with an obligation. In this way, the giver risks being suspected of influencing the recipient to provide a return benefit.

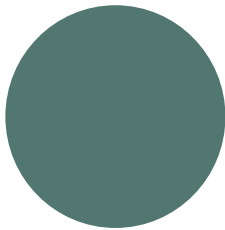
Gifts must be understood broadly and, in this context, can be:

- Cash or shares
- Donations to political parties and charities

- Benefits, including discounts

To avoid misunderstandings or suspicion of misconduct, staff must not request gifts and other benefits from customers, suppliers or partners.

Staff may accept or give gifts if the following conditions are met:



- ✓ Gifts may not in any and all situations exceed a total value of DKK 500 for either the sender or the recipient.
- ✓ Individual gifts may only be given and received in connection with special occasions, such as an anniversary/retirement or a "round-number" birthday.
- ✓ Joint gifts to an entire department or team may only be accepted on special occasions such as holidays and special events in connection with projects - this includes individual gifts that are shared with a department.

In special cases where EG gives or receives gifts exceeding the threshold of DKK 500, the gift and amount must be approved by the immediate manager and EG's Compliance function.

Information about date, recipient, value of the gift and reason must be reported to Group Legal & Compliance (agreement@eg.dk) Further handling of such cases will be assessed against the intent of this policy.

2.2. Hospitality

Ordinary hospitality for business purposes will typically be an invitation to lunch or dinner. Staff can receive and offer customary hospitality for business purposes, i.e. with a specific academic purpose and content that is reasonable and not extravagant in nature. Limitation of costs for the reimbursement of expenses for such hospitality is stated below.

The EG staff should exercise the utmost care in accepting hospitality. The staff must always assess what the appropriate and acceptable level is regarding expenses for hospitality in accordance with the circumstances of the specific event. The Staff is encouraged to act diligently and not spend more money than reasonably required for the relevant occasion.

If the EG staff is providing hospitality to a vendor, customer or another business partner the amount for hospitality must not exceed 1500 DKK. As an expectation, if hospitality provided by EG staff to a vendor, customer or another business partner exceeds 1500 DKK, this requires prior approval from the immediate manager, who does not participate in the event and Group Legal & Compliance.

The EG staff must be aware of vendor, customer and other business relationships' guidelines and policies for hospitality.

As an exception and only in connection with a professional event, other types of hospitality can be granted, e.g. invitations to conferences, hotel stays, flights and tickets to sports or entertainment events. If staff wishes to offer or receive such form of hospitality or treatment, it requires prior approval from the immediate manager, who does not participate in the event and Group Legal & Compliance, cf. above.

Courses, events and excursions can in many cases be perceived as a gift. Therefore, courses, events and excursions must have predominantly professional content in order not to have tax consequences for the recipient and not to be regarded as a gift. It is therefore essential that the participants are selected on the basis of objective and transparent criteria.

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2.3. Charitable Donations

As part of its corporate citizenship activities, EG may support local charities or provide sponsorship, for example, to sporting or cultural events. EG shall only make charitable donations that are legal and ethical under local laws and practices and also within the corporate governance framework of the organization. All such charitable donations must be pre-approved by the CEO of the Company. The Prerequisites shall be:

- a. The amount shall be inclusive of VAT /or similar tax under the local laws
- b. must be pre-approved by the CEO of the Company

2.4. Sponsorships

Sponsorships are closely allied to the various types of community / business activities undertaken by EG. These could range from sponsoring educational scholarships to local sports teams. Any sponsorship must be for genuine business or charitable objectives without any element of quid pro quo. All such sponsorships must be pre-approved by the CEO of the Company. The Prerequisites shall be:

- a. The amount shall be inclusive of VAT /or similar tax under the local laws
- c. must be pre-approved by the CEO of the Company

3. CONFLICT OF INTEREST

A conflict of interest arises when Staff have a private interest that potentially affects the result of a decision or the performance of their tasks at EG. EG staff must avoid conflicts between their own personal interests and EG's interests.

Private interests are benefits for yourself or one's family, relatives, friends or a company or organisation with which one has or has had a close professional or political affiliation.

Staff must avoid favoring family or friends and thereby giving them advantageous treatment due to a close relationship, as opposed to a professional and objective assessment of the person's abilities and professional qualities.

Before you enter into an agreement with or employ such persons you must consult with your manager.

3.1. Record-Keeping

EG must ensure all expenses relating to hospitality, gifts or expenses incurred to Third Parties are submitted in accordance with internal record keeping rules and regulations together with reasons for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts will be kept "off book" to facilitate or conceal improper payments and the same is ensured through effective monitoring and auditing mechanisms in place.

3.2. Reporting of Corruption

Corruption or suspicion of corruption involving EG or its staff, including members of the board of directors and the executive board or other persons representing EG, must be reported immediately to EG.

Reporting can be done using the normal communication channels, by notifying a manager or supervisor, or by submitting a report [via the whistleblower scheme](#). If the whistleblower scheme is used, the whistleblower may choose to report anonymously or provide their name. Further information about the reporting tool can be found in the whistleblower scheme.

In the event of confirmed or suspected cases of corruption, e.g. bribery, EG decides whether the case should be reported to the authorities.

Staff can also pose questions and concerns about specific behaviour to a manager

4. COMPLIANCE

In addition to the ethical considerations, non-compliance with the anti-corruption and bribery policy may have legal consequences in relation to, among other things, procurement legislation, employment conditions and criminal liability for both the staff and EG.

Consequences in connection with the Public Procurement Act

Where, in connection with a tender, a candidate or tenderer has been convicted or fined by final judgment for bribery, the public sector customer may exclude the candidate or tenderer from participating in the tender in question.

Consequences in terms of employment rights

If staff do not comply with this anti-corruption policy, this may have consequences for the conditions of their employment at EG.

Consequences in terms of criminal liability

Bribery, embezzlement, fraud, fraud of mandate and misconduct are criminal offences. Failure to comply with national legislation in this area may result in imprisonment for the staff and fines for both staff and EG.

5. RELATED POLICIES AND SOPS

RELATED POLICIES
Whistleblower Scheme
EG Code of Conduct – Workers
ESG Policy

6. APPENDIX

6.1. Definitions

Terminology	Definition
Bribery	means and includes the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribery includes advantages provided directly, as well as indirectly through an intermediary
"Corruption"	is defined as the misuse of entrusted power for own personal gain. Gain becomes a concern when one's "own" private interests are served at the expense of EG. "Gain" can be financial, such as money, property, or investments acquired improperly. It also includes non-financial benefits like preferential treatment, exclusive opportunities, or an enhanced reputation resulting from questionable actions.
Donation	A donation refers to the provision of monetary or non-monetary gifts to a fund or cause, with or without expectation of receiving services or payments in return. It is essential to note that contributions to industry associations or fees for memberships in organizations serving business interests may not inherently constitute donations
Facilitation Payments	are typically small, unofficial payments (sometimes known as "grease payments") made to secure or expedite a routine government action by a government official.
"Third Party" and "Intermediary"	includes any individual or organization, who/which comes into contact with EG or transacts with EG, and also includes actual and potential clients, vendors, consultants, retainers, agents, advisors, distributors, business associates, partners (including academic institutions), contractors, suppliers or service providers who work for and on behalf of the EG.