

ANTI-BRIBERY & CORRUPTION POLICY

This Policy outlines our commitment to anti-corruption and anti-bribery compliance.

Damstahl strictly opposes and condemns all forms of bribery and corruption. Hence, this Policy has been developed to prevent bribery and corruption as well as to ensure compliance with national and international standards concerning anti-corruption and bribery across all Damstahl activities.

The UN Global Compact encompasses 10 principles that Damstahl upholds to actively contribute to the UN's sustainable development goals. This means that Damstahl has committed to combat corruption in all its forms. Therefore, this anti-corruption policy should also be seen as an initiative in Damstahl's alignment with the UN Global Compact.

Our general guidelines

This policy establishes guidelines for both offering and accepting gifts to ensure that Damstahl maintains the highest ethical standards.

Definition of Gifts: Any item, favor, hospitality or service provided without an obligation for payment or consideration, including tangible gifts, gift cards, and monetary gifts.

- a) **Compliance:** Employees must adhere to all relevant laws and regulations regarding gifts and hospitality.
- b) **Transparency:** Any gift exchanges should be transparent and therefore consequently reported to your direct leader.
- c) **Proportionality:** The value of gifts, entertainment, or hospitality should be reasonable and appropriate for the occasion. Cash gifts are always strictly prohibited, regardless of the amount.
- d) **Non-Obligatory:** Gifts, entertainment, and hospitality should never be offered or accepted with the expectation of receiving preferential treatment or any business advantage.

- e) **Refusal of inappropriate Gifts:** Employees should politely decline gifts, entertainment, or hospitality that may compromise their independence or create a conflict of interest.

Communication and monitoring

Our leaders play a crucial role in demonstrating strong leadership commitment to ethical practices, leading by example and promoting a culture of integrity throughout the organization. Therefore, it is the responsibility of every Damstahl leader to communicate this Policy and ensure that all current and future employees, understand and comply with the aims and procedures of this Policy. This focus is also highlighted in our *10 Leadership Guidelines*.

Consequences of Policy violations

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of *all* employees of the Damstahl Group. This requires each employee to immediately notify Damstahl in case they believe or suspect a conflict with this Policy has arisen or might arise in the future. Likewise, if they receive a bribe, are solicited to provide one, anticipate such a situation, or become aware of any form of unlawful activity, they should report it without delay.

Non-compliance with this policy may result in disciplinary action including possible termination of employment or contract.

Collective management

We also want to influence our business partners in a positive direction and thereby counteract the risk of anti-corruption. In this regard, personal communication and our Supplier Code of Conduct stand out as essential instruments. We therefore see stakeholder engagement as a valuable part of mapping and managing the risk of anti-corruption and bribery. Our supplier visits and meetings helps us to secure that we're in continuously close contact and thereby able to confirm that our suppliers are upholding our Supplier Code of Conduct.

Our Whistle blower portal

The whistleblower portal has since December 2021 been open for both internal

and external reporting with access from all Damstahl Group websites. We also regard this portal as a vital instrument in our endeavor to prevent and combat corruption.

[Go to our Whistleblower portal](#)

Where to turn for help

Employees can always seek advice from their local team leader if in doubt about whether an action could be perceived or considered corruption. We encourage all stakeholders in our value chain to report any suspicions through our whistleblower portal or designated email csr@damstahl.com. Your vigilance is crucial in upholding our commitment to ethical business practices, ensuring a corruption-free environment throughout our value chain.