

ENGSKO A/S — Anti-Corruption & Bribery Policy

Version: 1

Owner: ENGSKO A/S — Legal & Compliance / ESG

Effective date: January 1st, 2026

Review date: Annually or as required

1. Purpose

This Anti-Corruption & Bribery Policy sets out ENGSKO A/S's commitment to conduct business ethically and in compliance with all applicable anti-corruption and anti-bribery laws. The policy aims to prevent, detect, and address bribery, corruption, and related misconduct by employees, contractors, suppliers, agents, and business partners.

2. Scope

This policy applies to all directors, officers, employees (permanent, temporary and contract), interns, apprentices, and consultants of ENGSKO A/S, and extends to our subsidiaries, joint ventures where ENGSKO has control, and to our third-party partners, suppliers, agents, distributors, contractors and any other stakeholders acting on behalf of ENGSKO (collectively "Partners"). It applies in all jurisdictions where ENGSKO operates.

3. Key Definitions

- **Bribery:** Offering, promising, giving, requesting, agreeing to receive, or accepting a financial or other advantage to induce or reward improper performance of a person's duties.
- **Corruption:** Abuse of entrusted power for private gain — may be public (involving public officials) or private (between commercial entities).
- **Facilitation payment:** Small payment made to expedite routine government actions (e.g., issuing permits). These are prohibited under this policy unless explicitly permitted by law and approved in writing by Legal.
- **Conflict of interest:** A situation in which a person's private interests may conflict with their duties to ENGSKO.

4. Policy Statement

ENGSKO has a zero-tolerance approach to bribery and corruption. All business must be conducted lawfully, ethically, and transparently. Employees and Partners must not offer, give, solicit, or accept bribes or other improper advantages for any purpose.

5. Prohibited Conduct

Examples of prohibited conduct include, but are not limited to:

- Offering, promising or giving a financial or other advantage to a public official or any third party to influence a decision or secure an improper business advantage.
- Accepting, soliciting or agreeing to receive any financial, material, or other personal benefit — whether money, gifts, services, favors, or promises — in exchange for performing one’s professional duties in a biased, dishonest, or improper manner, or for giving an unfair advantage to another party.
- Making or receiving facilitation payments, unless expressly approved by Legal under exceptional circumstances.
- Using third parties (agents, consultants, joint venture partners, suppliers) to channel improper payments or hide the true nature of transactions.

6. Gifts, Hospitality & Entertainment

- Gifts, hospitality, and entertainment may be acceptable where they are reasonable, proportionate, infrequent, compliant with local law and company policy, and not intended to influence a business decision.
- Employees must never accept or offer gifts or hospitality that could create — or appear to create — a conflict of interest or an obligation.
- All gifts and hospitality above the monetary threshold of DKK 750 / EUR 100 or must be notified and recorded as a Gifts & Hospitality register.

7. Facilitation Payments

Facilitation payments are prohibited except in narrowly defined emergency circumstances (e.g., to protect life or safety) and then only with prior written approval from a senior manager and Legal where practicable. Any such payment must be promptly reported and documented.

8. Political Contributions & Charitable Donations

- ENGSKO will not make political contributions to political parties, campaigns or candidates on behalf of the company without Board approval and in compliance with applicable law.
- Charitable donations must be bona fide, recorded transparently, and must not be used as a substitute for bribery. Donations to charities linked to public officials require enhanced due diligence and pre-approval by the ENGSKO board and the local Legal department.

9. Third-Party Due Diligence

- ENGSKO will conduct risk-based due diligence on third parties (suppliers, agents, distributors, consultants, joint venture partners) before onboarding and periodically thereafter.
- Contracts with third parties must include anti-corruption representations, warranties, and audit/cooperation rights, and the right to terminate for violation of anti-corruption laws.

10. Procurement & Contracting

Procurement decisions must be made on merit, price, quality, and compliance. Employees involved in procurement must follow internal procurement procedures, declare conflicts of interest, and avoid any arrangement that could give rise to bribery or corruption risks.

11. Gifts, Conflict of Interest & Personal Transactions

Employees must declare any personal, family, or financial relationships that could influence business decisions. Where a conflict exists, the employee must recuse themselves from the decision and escalate to their manager and CEO.

12. Reporting & Whistleblowing

- ENGSKO encourages reporting suspected violations. Reports can be made confidentially and anonymously where permitted, via whistle@Engsko.com
- Retaliation against whistleblowers who report in good faith is strictly prohibited and will result in disciplinary action.

13. Investigation & Response

Allegations will be investigated promptly, impartially, and discreetly by Compliance/Legal (or an independent investigator where appropriate). Where misconduct is substantiated, ENGSKO will take corrective action — including disciplinary measures, contract termination, and reporting to local authorities — as necessary.

14. Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action up to and including termination of employment or contract. For Partners and suppliers, breach may result in contract termination, financial penalties, refusal of future business, and reporting to regulatory or law enforcement authorities. ENGSKO will apply these consequences proportionally and consistently.

15. Training & Communication

All relevant employees and Partners will receive this document with a proper explanation. New hires in high-risk roles will be introduced to these policies during their onboarding period. Communications about the policy will be made available via the company intranet and partner portals.

16. Record-Keeping & Internal Controls

Accurate books and records must be maintained. Employees must not create, falsify or alter records to conceal improper payments. ENGSKO will maintain internal controls and periodic audits to detect and prevent bribery and corruption.

17. Monitoring, Review & Continuous Improvement

Compliance with this policy will be monitored through audits, risk assessments and management reviews. The policy will be reviewed at least annually or when significant changes occur.

18. Contact & Further Information

For questions or to report a concern, contact:
CEO Henrik Wollesen or send us an email to info@engsko.com