



Danish Crown

Group Anti-Corruption Compliance Policy

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



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 each employee 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) Each 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.

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.



Corruption

2 – Corruption is never acceptable

In Danish Crown we do not tolerate corrupt behavior 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.

2.1 – Examples of corrupt behavior

Corruption is generally defined as "the abuse of a position or an office to obtain private gain". Corrupt behavior includes, among other things, bribery, extortion, facilitation payments, kickbacks, trading in influence, nepotism (favorizing treatment of one's relatives or friends), etc.

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 favor) and, thereby, are expected to give or receive improper advantages, i.e. a benefit you are not automatically entitled to or advantages which cannot be obtained honestly and legally. Bribery is illegal both when taking place in the private sector as well as in the public sector.

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

Remember that both giving and receiving a bribe or an improper advantage is prohibited.

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, hospitality and travel expenses

In Danish Crown we do not give or accept gifts, hospitality or travel that could raise concerns about our integrity.

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

Donations and sponsorships

In Danish Crown we never offer or give charitable donations, sponsorships or other kind of non-political contributions to unduly influence the recipients.

Please see the Danish Crown Standard on charitable donations and sponsorships for further advice and guidance. (To be prepared)

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.

Facilitation payments are considered a practical form of corruption and such payments are therefore prohibited.

If you encounter a request for facilitation payments, you are expected to actively challenge them. Danish Crown is willing to face the extra time, costs and efforts to avoid such payments.

Remember - safety always comes first

In Danish Crown the health, freedom and personal safety of our employees always comes first. Therefore, complying with this Policy shall never compromise or endanger someone's (employee or non-employee) health, freedom or personal safety.

Please see the Danish Crown Standard on facilitation payments for further advice and guidance.



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. Please see the Danish Crown Standard on interactions with public authorities and public officials for further advice and guidance. (To be prepared).

2.3 – Third Parties

As a part of doing business, we sometimes engage third parties (companies or individuals who are not part of or employed in Danish Crown) to provide services for us and/or represent us in interactions with public authorities and public officials.

Danish Crown is exposed to liability and reputational damage for any illegal or unethical behavior conducted by the 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.

Please see the Danish Crown Standard on managing third parties for further advice and guidance. (To be prepared)



Want to know more

3.1 – Practical guidelines on avoiding corrupt behavior

In order to avoid corrupt behavior a number of practical guidelines have been developed in form of Danish Crown Standards. The Standards include:

- A. Danish Crown Standard - gifts, travel and hospitality
- B. Danish Crown Standard - donations and sponsorships (to be prepared)
- C. Danish Crown Standard - facilitation payments
- D. Danish Crown Standard - interacting with public authorities (to be prepared)
- E. Danish Crown Standard - managing third parties (to be prepared)

3.2 – How to seek further advice or report a concern

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

As 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.

Any violation or suspected violation 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.