

Anti-Bribery and Anti-Corruption Policy

Our purpose is aligned with our value of RESPECT. We strive to prevent instances bribery and corruption in our business.

This policy, referred to as the Anti-Bribery and Anti-Corruption (ABAC) Policy, sets out the Monjasa Group commitment to complying with the ABAC laws, including but not limited to the Foreign Corrupt Policies Act, the UK Bribery Act, and the Danish Law. These regulations apply to the Monjasa Group, guided by the ABAC framework.

To fulfil our responsibilities concerning ABAC, the Monjasa Group has implemented following measures:

- Maintaining a Compliance Department that is independent, has and develops the necessary expertise, and is in close communication with all relevant departments, including Monjasa Holding and its Board of Directors;
- Maintaining and updating a Risk Assessment to measure and manage bribery and corruption risks in the Group;
- Maintaining and updating the ABAC Policy and Procedure framework, that establishes what is and is not allowed, the consequences of not complying with the ABAC Policy, and the criteria concerning gifts, hospitality, entertainment, facilitation payments, charitable donations, political contributions, commissions, document keeping, and all other relevant matters;
- Maintaining and updating appropriate controls, tools and systems to monitor on-going customer and vendor activity;
- Maintaining and updating appropriate procedures for reporting suspicious activity internally and externally to the relevant law enforcement authorities as appropriate;
- The maintenance of appropriate records for a minimum of 5 years; and
- Conducting regular trainings to employees and keeping relevant training records.

This policy applies to the entire Monjasa Group and any of its subsidiaries.

As a Monjasa employee, you should:

NEVER engage in bribery or corruption by offering, giving, accepting, requesting, promising or providing anything of value to or from any public official or to any business partner in order to gain unfair business advantage of any kind.

REPORT concerns of potential bribery and corruption attempts to the Compliance Department or via the Whistleblowing System.