

# **MGP.143.1.0 Monjasa's Anti-Bribery Anti-Corruption Policy**

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## 1. Introduction

At Monjasa, we uphold a zero-tolerance stance against bribery and corruption and are committed to conducting our business activities with transparency and integrity wherever we operate. Monjasa's Anti- Bribery and Anti-Corruption Policy, hereafter Policy, sets out the principles, standards, and controls for ethical business conduct across all Monjasa offices globally.

Our Policy is guided by international and local Anti-Corruption laws, including but not limited to the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), Danish legislation, and other applicable local legislation.

## 2. Scope

This Policy applies to all Monjasa Employees, directors, contractors, consultants, agents, brokers, and Third Parties acting on behalf of Monjasa. It covers all business dealings, including interactions with private entities, Government Officials, and Government-Owned Entities.

## 3. Definitions

Term	Definition
<b>Bribe</b>	Anything given or received that is of value to gain an unfair advantage of any type, to a Government Official, to an individual, or to a company. This includes but is not limited to cash, payment by other means, accommodation, travel, tickets to events, gifts, offer of employment or internship, scholarship, or donation.
<b>Commission</b>	A fee paid to an agent or intermediary for transacting a piece of the business or performing a service. A commission can be paid as a percentage of a concluded deal, or as a regular payment for services provided under an agreement.
<b>Charitable Donation</b>	This refers to a voluntary contribution made by an individual or company to a non-profit organization, charity, or foundation, without any expectation of receiving a benefit in return. While charitable donations are often monetary, they may also include other assets, goods, or services.
<b>Employee</b>	Officers, directors, personnel whether fixed term, permanent or probationary, trainees, volunteers, and interns.
<b>Facilitation Payment</b>	Small financial payment often to a low-level Government Official that may constitute a bribe and is made with the intention of expediting an administrative process.
<b>Gift</b>	An item given voluntarily to a Third Party as a token of appreciation or to celebrate an occasion without the expectation of any form of compensation.
<b>Government-Owned Entity</b>	A Government Owned Entity (GOE) is a business enterprise where the government or state has significant control through full, majority, or significant minority ownership.
<b>Hospitality</b>	An invitation to social activity, meals, travel, or events in which a Third Party participates that is paid for by Monjasa without compensation intended to foster legitimate business relationships.
<b>Political Contribution</b>	A voluntary donation made to a politician, political party, or campaign, likewise without any expectation of personal or corporate gain. Such contributions may take the form of money, goods, services, or intellectual support. Political contributions should only be made in exceptional circumstances.

Term	Definition
<b>Public/Government Officials</b>	Any officer, director or employee of a government or of any department, agency, political party or instrumentality thereof or of a public international organization (such as NATO), or any person acting in an official capacity for or on behalf of any such government or department or agency.
<b>Sponsorship</b>	It is a voluntary act of providing financial support or another form of benefit to assist an organization in carrying out an event, program, or activity.
<b>Third Party</b>	Any individual not employed by Monjasa acting on behalf of Monjasa, including agents, brokers, consultants, or contractors.

#### 4. Policy Statement

Monjasa prohibits any form of bribery or corruption. No Employee may offer, give, solicit, or accept anything of value for the purpose of influencing a business decision or securing an improper advantage. This prohibition includes, but is not limited to the following actions made for corrupt purposes:

- a) Cash payments or cash equivalents such as vouchers
- b) Gifts
- c) Hospitality
- d) Political, charitable donations or sponsorship
- e) Business, employment or investment opportunities
- f) Personal discounts or credits
- g) Assistance to or support of family members.

Monjasa does not permit or condone offering, giving or receiving any type of bribes as mentioned in (a) – (g) to win or influence the award of a customer's business, or to obtain an improper advantage in the conduct of Monjasa's business and operations – even where the offer is not accepted or where the payment is made but no advantage is gained.

#### 5. Third Parties

Monjasa cannot do indirectly through Third Parties what it is not permitted legally to do itself. When Monjasa engages any Third Party, including but not excluding representatives, consultants, agents, brokers, law firms, tax advisors or others acting on Monjasa's behalf, the requirements for Third Party engagements must be complied with. This requires a due diligence (background check) to be performed on relevant Third Parties to identify issues generating concerns ("red flags") and assessing and addressing such.

At a minimum, the Third Party should be reputable and be compatible with Monjasa's values as set forth in Monjasa's Code of Conduct for Suppliers.

##### 5.1 Commissions to Third Parties

All Third Parties, including agents, brokers, and consultants, must undergo appropriate due diligence prior to engagement to ensure their integrity, legitimacy, and alignment with Monjasa's values. All third-party contracts must contain clear Anti-Bribery and Anti-Corruption (ABAC) clauses, including the company's right to terminate the agreement in the event of non-compliance. Payments to Third Parties shall only be made to the contracted legal entity through authorized and traceable banking channels.

#### 6. Gifts and Hospitality

##### 6.1 Gifts and Hospitality to Non-Government Officials

Gifts and hospitality must never be offered, given, or accepted with the intent of obtaining or providing an improper business advantage. The offering or receipt of cash or cash equivalents, such as gift vouchers or prepaid cards, is strictly prohibited.

Any gift exceeding the amount of 200 USD per person (250 USD for US offices) requires prior written approval from both the employee's Line Manager and Group Compliance. Gifts below this threshold require prior written approval from the Employee's Line Manager.

In respect of hospitality, exceeding the amount of 1000 USD per person requires prior written approval from both the Employee's Line Manager and Group Compliance. Hospitality below this threshold requires prior written approval from the employee's Line Manager.

**Extravagant or luxury items such as watches, jewelry, cash payments or cash equivalents such as vouchers or other high-value gifts, are not permitted under any circumstances.**

See annex I for detailed overview.

## 6.2 Gifts and Hospitality to Government Officials

When engaging with Government Officials or employees of GOE, Employees must exercise heightened caution to ensure compliance with applicable anti-bribery and corruption standards. Gifts, entertainment, travel, or any other benefits must **not** be offered or provided to Government Officials, as well as close family members of any Government Official, without prior written approval from Group Compliance, irrespective of the value involved.

Additionally, the hiring or engagement of a close family member of a Government Official requires prior written approval from both the Employee's Line Manager and the Group Compliance to prevent any actual or perceived conflict of interest.

## 7. Facilitation Payments and life-threatening situations

Monjasa maintains a strict zero-tolerance stance toward facilitation payments. Such payments, unofficial sums made to expedite routine actions are prohibited under all circumstances. However, in exceptional cases where a payment is demanded under duress or threat to an individual's safety, liberty, or health, the employee may proceed with the payment to prevent harm. Any such incident must be reported to Group Compliance immediately after the occurrence and fully documented for review and follow-up.

## 8. Charitable and Political Contributions

Monjasa does not make political or charitable contributions, donations, or sponsorships intended to influence business decisions, secure improper advantages, or affect legislation.

Prior approval by Group Compliance and Monjasa's CFO shall be required for any contribution or sponsorship to a political party, candidate or Government Official, or to any entity with which a political party, candidate or Government Official, or a family member of same, is associated with or involved in.

Prior approval by Group Compliance and the Employee's Line Manager shall be required prior to making any charitable contribution, donation or sponsorship.

## 9. Books and records

Employees are prohibited from making any false or misleading statements in Monjasa's books

and records for any reason and must ensure that records reflect the true nature of the transaction. All transactions must be correctly approved and coded to the correct expense description and based on Monjasa's rules and guidance.

#### **10. Consequences of Violation**

Individuals who violate anti-corruption laws may face criminal prosecution potentially resulting in prison sentence, monetary fines or other governmental action. Monjasa cannot indemnify their officers and Employees against liability under these laws, which means that penalties can be levied against individuals without reimbursement by Monjasa or an insurer. This is also applicable to officers and Employees who are no longer employed at Monjasa. Violations may also lead to criminal or civil penalties imposed on Monjasa. Equally important, violations of global anti-corruption laws could severely damage the reputation of Monjasa, sanctions form the prohibiting participation in public tenders and restricting Monjasa's ability to do public sector business.

#### **11. Reporting and Disciplinary Actions**

Monjasa will not tolerate the dishonest or unlawful achievement of results by any Employee, whether directly or via a Third Party. Any violation of this Policy may result in disciplinary action, including termination of employment or contract.

No Employee will be penalized or be subject to other adverse consequences for refusing to pay bribes, even if it may result in Monjasa losing business. Any actions to the contrary (penalization or adverse consequences) should be reported as per below.

Any violation or suspected violation of the global anti-corruption laws or this Policy must be reported immediately to any of the following:

- Monjasa Group Compliance; or
- Monjasa Whistleblower System; or
- Any member of Monjasa Management.

Failure to report a suspected violation constitutes a violation of the Policy.

#### **12. Responsibility Matrix**

Task/Department	All departments	Group Compliance	Management
Approval Gifts, Entertainment, and travel	S	E	
Approval political donations, charitable contributions, and sponsorships	S	E	I
Approval hiring of relatives of GO	S	E	I
Reporting of violation	E	S	I
Facilitation payments	E	S	I

E = Department to execute;

S = Supporting department (originator of the request); I = Department to be informed

**Annex I:**

Type of Activity	Threshold / Limit	Required Action	Approval Required
<b>Gift (give/receive)</b>	<ul style="list-style-type: none"> <li><b>All offices excluding US offices:</b> USD 200/person</li> <li><b>US offices:</b> 250 USD/person</li> </ul>	Must be documented	Line Manager
<b>Gift (give/receive)</b>	Above the threshold	Requires pre-approval before exchange	Line Manager & Compliance Department
<b>Hospitality(meals, events)</b>	All offices: USD 1,000/person	Must be documented	Line Manager
<b>Hospitality(meals, events)</b>	Above the threshold	Requires pre-approval before commitment	Managing Director & Compliance Department
<b>Public Officials (all engagements)</b>	Any value	Always requires prior written approval	Compliance Department
<b>Charitable Donations / Sponsorships</b>	Any value	Due diligence required; must be documented	Compliance Department & Managing Director
<b>Commissions</b>	Any value	Must be justified by contract	Finance
<b>Facilitation Payments</b>	Not permitted (except under threat to life or safety)	Report immediately to Compliance	Compliance Department