

ANTI-CORRUPTION POLICY

MINIMUM A/S is committed to adhere to the UN Convention Against Corruption.

WHAT IS CORRUPTION?

Corruption is defined as the abuse of entrusted power for private gain. Corruption is not always about money, it can also be for example preferential treatment, extra service to gain an advantage.

Employees of MINIMUM A/S and our partners must avoid the following situations of corruption:

CONFLICT OF INTEREST

- This occurs in situations where an employee has a private interest or personal gain from a certain situation or deal.

BRIBERY

- Bribery is the act of offering, giving (active bribery), receiving, or accepting (passive bribery) any item of value to influence the actions of an employee.
- MINIMUM A/S will not give or accept bribery in any form.

EXTORTION

- Extortion occurs when an employee unlawfully demands or receives money through intimidation. Extortion may include threats of harm to a person or his/her property, threats to accuse him/her of a crime/illegal act, or threats to reveal embarrassing information.
- Employees of MINIMUM A/S must not seek to influence any person by using their position or by using force or threats.

FRAUDULENT BEHAVIOUR

- Fraudulent behaviour involves deliberately being

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FRAUDULENT BEHAVIOUR

- Fraudulent behaviour involves deliberately being dishonest or misleading, engaging in deceitful behaviour or acting under false pretences.
- Employees at MINIMUM A/S must not exercise such behaviour under any circumstances.

RECEIVING GIFTS AND HOSPITABLE BEHAVIOUR

- Gifts and hospitality may be used to enable corruption or may give the appearance of corruption. Gifts may include cash or assets given

as gifts.

- Hospitality may include meals, hotels, flights, entertainment or sporting events.
- As a general rule, employees should not receive gifts or other benefits in connection with their work. However, giving small gift and showing hospitality may be customary in some countries, and it would be impolite not to receive it. However, gifts, should be kept within a reasonable financial level, that reflects the nature of the business with that specific partner.
- Gestures which may be considered remuneration for a task performed, such as a couple of bottles of wine for doing a presentation, are not considered gifts.
- Employees at MINIMUM A/S must not give, request, or receive directly or indirectly

NEPOTISM

- Nepotism is incidents where family and friends are favoured and treated advantageously due to close personal relations, rather than on the basis of a professional assessment of their capabilities.
- Employees of MINIMUM A/S must not favour friends, family or other close relations in recruitment, procurement, or other situations.

All employees of MINIMUM A/S are obligated to notify their superior immediately about any proof or suspicion of breach of one or more anti-corruption principles. This applies regardless of whether the case involves other employees, business partners and partners in programmes or projects.

They are also obligated to notify their superior about potential or current conflicts of interest.

Non-compliance of this policy will result in termination of contract, this includes contracts/orders with our suppliers and/or employment contracts with our employees.

FOR SUPPLIERS

MINIMUM A/S Code of Conduct includes our non-acceptance towards corruption in any form. Signing that, you also sign this policy.

FOR EMPLOYEES OF MINIMUM A/S

Employee of MINIMUM A/S have been made aware of this policy and new employees are made aware, upon hiring.