

## **Anti-corruption policy (ABC-policy) for companies in Cibicom**

Group:

- Cibicom A/S
- Cibicom Services A/S
- Cibicom Mobility ApS
- Sense Solution ApS
- Telpartner A/S

### **Cibicom's values are:**

Community, Responsibility and Simplicity.

## **Introduction**

Cibicom has a clear position on employees, management and board of directors abides by the Danish and international legislation. Through our anti-corruption policy, we recognize and emphasize our commitment to prevent corruption and to update ourselves on initiatives and legislation in this area.

The purpose of this anti-corruption policy is to guide in cases regarding corruption and to indicate to Cibicom's and its employees the responsibility to uphold a zero tolerance to corruption, which implies that any employee, whom has or will have a suspicion or knowledge of corruption is obliged to inform one's nearest superior, the Legal Department or Cibicom's Whistleblower system.

The purpose of this anti-corruption policy is to ensure personal and organizational integrity for Cibicom and to ensure and support a behavior and work ethic which sets the highest standard for us and our collaborators. The anti-corruption policy provides guidelines to prevent corruption and guidelines regarding how Cibicom's employees must react to suspicions of corruption and corrupt behavior.

**On corruption:**

Corruption is defined as abuse of entrusted power/knowledge for one's own gain, and it is undermining to society and the values of democracy and the trust in these. A positive or neglective position on and attitude towards corruption causes laws to lose significance and a Community of law its integrity.

Cibicom tolerates no form of corruption. We have introduced measures to ensure that none of our employees accepts any kind of bribery and does not give nor accept especially advantageous offers from persons, agents, intermediaries or other third parties. This also includes offers, hospitality, contributions or sponsorships, which if accepted will be announced transparently.

Our anti-corruption policy is based on principles, which are a part of

- OECD's guidelines for multinational enterprises
- The UN Global Compact
- UK Bribery Act from 2010
- Danish and international legislation

Cibicom's understanding of corruption covers but does not exclude receiving and giving, requesting, and ensuring bribery and other forms of active or passive corrupt behavior in receiving and giving of money, services, protection, extra services or similar.

Cibicom commits in this anti-corruption policy to act professionally, ethically and honestly and commits to implementing systems to prevent corruption and bribery punishable by Danish penal law § 122, § 144, and § 299 section 2 i.e.

**Anti-corruption policy****Guidelines**

Cibicom has introduced following guidelines for correct understanding and management of our ethical standards.

- Conflicts of interest:

We will avoid any inappropriate conflicts of interests – real or potential – between personal interests and Cibicom’s interests. Conflicts of interests occur in situations where efforts of Cibicom or collaborators is affected by one’s private or personal interests. Conflicts of interests are not necessarily corrupt behavior, but must be identified and handled correctly to stave off suspicions and commits employees to immediately inform one’s nearest superior, the Legal Department or Cibicom’s Whistleblower system.

- Extortion:

We will not seek to influence persons, organizations or institutions for our own gain by using our position or offering individual advantages, nor will we use any kind of extortions, force, violence or threats of this as a means to gain advantages. Employees are prohibited from using their professional status for their own gain and from abusing authority to gain personal advantages or services from employees.

- Fraud and embezzlement:

We will refrain from misrepresentation, cheating or breach of confidence to gain a unjust or dishonest, professional or private advantage. Fraud is an economical crime, including all aspect down to counterfeiting, illegally obtaining advantages or money. Embezzlement is unlawful acquirement, abuse or theft of property or money, one is lawfully entrusted by power of one’s position.

- Bribe:

We will not give or accept any kind of bribe, facilitation money or pay gratuity, nor offer or receive money, services or other values from persons or collaborators regarding gaining influence or advantages.

- Nepotism and favoritism:

We will not favorize friend(s), family or other personal relations regarding employment, buying, help or other situations, when other candidates are better qualified and willing to do the job, or give a better salary or other goods to employees with personal relations to our management.

- Gifts:

We will not directly or indirectly give, request or receive gifts, financial goods or services with an expectation of quid pro quo or reciprocated services.

Employees can continue to accept common hospitality and smaller gifts if it is of reasonable extend and limited financial value, as we internally in Cibicom have decided that these gifts will be given to the community and will be allocated on the yearly Cibicom bingo-night.

## **Management and completion:**

### **For employees**

As an employee at Cibicom, you must ensure that you have read and understood as well as acts accordingly to the guidelines in this anti-corruption policy. As an employee, you must respect and promote the guidelines set forth in this anti-corruption policy. Any justified presumption of corruption is a important to report as direct knowledge hereof. This must be reported to one' nearest superior, the Legal Department or Cibicom's Whistleblower system. Actions inconsistent to Cibicom's anti-corruption policy can imply consequences of employment and a criminal complaint to the police for every involved parties.