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## Anti-corruption

### Purpose and definition

Anti-corruption is generally understood as actions to prevent bribery. Bribery means to (directly or through other parties) offer, promise, authorize or give money or anything else of value to any person – public officials or private persons - for what he/she is not supposed to do, e.g. in order to obtain a business advantage, and includes any facilitation of these acts. Bribes can include not only money, but also donations, job offers or promotions, gifts, hospitality and entertainment.

Bribery is illegal in every country. Many countries also prohibit bribery by their citizens and companies occurring outside their home countries.

In addition to fighting bribery, employees are prohibited from using facilitation payments. A facilitation payment is a small value payment to a low level official to cause that person to perform a routine task he/she refuses to perform without some payment, whereas a bribe is paid to cause that official to do what he/she should not do.

Violations of anti-corruption laws may lead to large fines, authorities imposing audits and costly compliance programmes, authorities blacklisting companies and/or barring them from government business, loss of business and damage to Salling Groups reputation. Individuals risk imprisonment.

### Responsibility

All employees, including managers and directors, are committed to comply with anti-corruption laws and our anti-corruption policy.

Head of Legal is responsible for Salling Group's anti-corruption policy.

Heads of Business Units and CEO's are responsible for incorporation of and compliance with the anti-corruption policy within their respective areas of responsibilities. This includes:

- Conducting due diligence of new agents, partners, key suppliers, as well as mergers and acquisitions targets prior to signing of contract.
- Risk assessment must be conducted before acquiring a company or entering a new country and signed off by the Business Unit appointed person responsible for implementation and compliance work
- Deviations to Salling Group's standard compliance clauses must be signed off by the Head of Legal. We do not tolerate intended violations of our anti-corruption policy
- Travel, meals, lodging and entertainment provided by Salling Group, including frequency, must always be strictly business related, and shall never be extravagant.

Expenses exceeding € 100 per recipient shall be accurately recorded in a designated register, readily available for review.

- Employees may never solicit gifts, entertainment or hospitality. Employees may accept entertainment and meals that are directly business related and of moderate value. Other than business related meals, employees must record, in a designated register, what they receive from external stakeholders valued at more than € 10.

### **Policy aim**

- Stress our integrity
- Ensure awareness among employees