

Company policy of

## **Anti-corruption**

### **1. The purpose of the policy**

Tusass must be a corporation with a high degree of transparency for all stakeholders. This policy must ensure a clear and uniform framework on all levels concerning business practices in the corporation. The employees in Tusass must maintain and respect this obligation every day.

### **2. Policy addressees**

*To whom does the policy apply?* All employees of Tusass.

*Where does the policy apply?* In Tusass.

*Exceptions, further refinements, or definitions.*

### **3. Description of policy (guiding principles, responsibilities, and duties)**

Tusass runs a responsible business and reject all forms of corruption, bribery and other forms of unethical behavior that may damage the reputation of the company.

Employees of Tusass must, at any time, carry themselves professionally and responsibly across departments and when dealing with customers and other stakeholders.

Tusass will seek to ensure in its procedures that risk of employees knowingly or unknowingly violate the law or policies.

#### **Corruption, bribes, sweeteners...**

The term corruption is the term for a variety of acts in which a person or organization misuses its position to gain undue advantages. We reject all forms of corruption and bribery.

#### **Company gifts and events**

The company may not, as a starting point, give or receive gifts or other advantages in connection to business activities, which are, or could be construed as, bribery.

Here, we refer to: '*Guidelines on company gifts*'

#### **Conflicts of interests and nepotism**

Personal relations must not affect the decisions med by company employees, such as favoritism of family members or friends based solely on personal relations.

### **How to report violations?**

Tusass has a whistleblower scheme where employees, members of the board and other stakeholders can anonymously report people with connection to the company in case of, or suspicion of, violations within the Tusass company.

Here, we refer to: '*Tusass Whistleblower scheme*'.

### **Exceptions, further refinements, or definitions**

Every Tusass employee is responsible for preventing and/or reporting bribery and other forms of unethical behavior. Employees are also obligated to avoid any activity that may lead to violations of the policy. Managers are responsible for their employees being aware of the policy and the adjoining policies.

### **4. Consequences/sanctions of violation**

Violation of the above, may result in consequences within the framework of employment laws.

### **5. Regulatory framework**

Financial Statements Act (*Årsregnskabsloven*) §99 a, UN Global Compact principles, Transparency International Greenland.

### **6. Revision responsible department**

HR, CSR and Payroll.

### **7. Approvals**

Approved by management on December 27, 2019