

Anti-Corruption Policy

April 2025

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MSCH COPENHAGEN are committed to adhering to the UN Convention Against Corruption and we expect the same commitment from our suppliers.

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 e.g. preferential treatment, extra service to gain an advantage.

Employees of MSCH COPENHAGEN and our partners must avoid these situations of corruption:

- **Conflict of interest**
 - This arises 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.
 - MSCH COPENHAGEN 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 MSCH COPENHAGEN must not seek to influence any person or body by using their position or by using force or threats.
- **Fraudulent behavior**
 - Fraudulent behavior involves deliberately being dishonest or misleading, engaging in deceitful behavior or acting under false pretenses.
 - Employees at MSCH COPENHAGEN must not exercise such behavior under any circumstances.
- **Receiving gifts and hospitable behavior**

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- Gifts and hospitality may be used to facilitate 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 rule, employees should not receive gifts or other benefits in connection with their work. However, giving small gifts 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 MSCH COPENHAGEN must not give, solicit, or receive directly or indirectly
- Nepotism
 - Nepotism is incidents where family and friends are favored and treated advantageously due to close personal relations, rather than based on a professional assessment of their capabilities.
- Employees of MSCH COPENHAGEN must not favor friends, family or other close relations in recruitment, procurement, or other situations.

All employees of MSCH COPENHAGEN 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 programs or projects. They are also obligated to notify their superior about potential or current conflicts of interest.

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