



Danish Crown

Anti-Corruption Compliance Programme

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1. Our programme

1.1 Governance

Corruption is a major obstacle to economic and social development around the world, and as a multinational company we are committed to combat corruption and bribery.

At Danish Crown, we have established a dedicated anti-corruption compliance programme to ensure the implementation of effective measures to mitigate the risks associated with corruption and bribery.

The objective of our Danish Crown Anti-Corruption Compliance Programme is to establish internal systems, controls and processes designed to identify and reduce the risk of a violation of the law and/or the Danish Crown Group Code of Conduct.

Danish Crown's Anti-Corruption Compliance Programme is based on the legal requirements and principles of the UK Bribery Act and the US Foreign Corrupt Practices Act. In addition to these legal requirements, the programme is based on the principles of the COSO Internal Control Framework.

We conduct a thorough risk assessment of corruption risks across the Group every two years to identify where current risks of corruption may exist with the aim of implementing appropriate preventive measures.

Our Code of Conduct sets out our commitment to zero tolerance of corruption. This Code of Conduct is further supported by an Anti-Corruption Compliance Policy and comprehensive standards covering the following areas:

1.1.1 Standard on Gifts, hospitality, and travel expenses

The purpose of this standard is to outline the rules for offering or receiving gifts, hospitality, or travel expenses. The standard also defines when a disclosure has to be made to the Danish Crown Disclosure Management System

1.1.2 Standard on Facilitation payments and small bribes

The purpose of this standard is to provide instructions to all employees on how to identify facilitation payments and small bribes and what to do if such a situation arises.

1.1.3 Standard on Conflict of interest

The purpose of this standard is to provide instructions on how to identify, avoid, and disclose a potential or actual conflict of interest with the interests of Danish Crown.

1.2 Top level commitment

Compliance with the law must be mandated at the highest level. Genuine management commitment and visible management support is a prerequisite for any compliance programme. Without management commitment, compliance efforts are unlikely to be successful.

Top-level commitment is essential to ensure dedication and focus on the implementation of controls.

At Danish Crown, we ensure top-level commitment by implementing the following procedures:

- (i) Policies and standards are approved by Danish Crown's Board of Directors.
- (ii) Danish Crown's Executive Management holds management accountable for promoting a sustainable compliance culture and provides targeted compliance messages; and
- (iii) Resources are allocated to ensure that relevant, targeted compliance activities are carried out throughout the Group to ensure a culture of compliance and know-how among employees.



2. Risk assessment

2.1 Scope of Risk Assessment

The purpose of the risk assessment process is to identify and assess risks globally to enable targeted compliance activities and controls. Group Legal conducts a risk assessment for its own business and for suppliers.

2.2 Own operations and suppliers

Danish Crown conducts an anti-corruption risk assessment within its own operations. The risk assessment focuses on our sales and procurement divisions, which are areas where high value transactions may occur. The risk assessment is based on the global Corruption Perception Index, which

indicates the perceived level of corruption in each country. This, together with various types of data, indicates whether a business area is low, medium or high risk.

In addition, the risk assessment is based on interviews with relevant employees within the areas identified as medium or high risk to understand how business is conducted in these areas, and what risks they themselves identify.

Danish Crown conducts an anti-corruption risk assessment with its suppliers, based on the Corruption Perception Index and expenditure.



3. Control activities

3.1 Purpose

Due diligence is essential when entering a business relation. The level of due diligence is based on the conducted risk assessment. As a general rule, all contracts, including standard terms and conditions, include our anti-corruption provisions, which require business relations to comply with regulation and laws.

3.2 Screening

Medium and high-risk business relations are subject to screening. We use a third party due diligence provider to screen for confirmed incidents of corruption or bribery. This is a key process in our compliance programme that enables us to safeguard our integrity by assessing the reputation, integrity and ethical practices of current and potential business relations.

3.3 Suppliers

Suppliers are subject to preventive measures such as being required to adhere to the expectations set

out in Danish Crown's Supplier Code of Conduct, self-assessments and/or audits to ensure that our suppliers are committed to anti-corruption initiatives.

3.4 KPI's

Danish Crown has implemented KPI's to measure the performance of the Anti-Corruption Compliance Programme. These KPI's measure the completion of e-learning, reportings, and concerns within the Danish Crown Group.

3.5 Documentation

To ensure documentation for audit and assurance purposes, the activities carried out in the Compliance Programme are documented.



4. Information and communication

4.1 Training and Awareness

Information and communication initiatives are critical to foster a culture of compliance and ensuring that Danish Crown employees understand the policies and standards related to anti-corruption. By providing regular training and awareness campaigns, we can increase employees' knowledge and awareness and address specific risks associated with their business activities.

To ensure that employees with access to a personal computer fully understand our organisational standards and policies on anti-corruption, all employees are required to successfully complete an e-learning course consisting of interactive videos and a quiz. We continually update the training material to ensure that it reflects our most significant risks.

Employees working in high-risk areas receive additional training to ensure they have a full understanding of the potential risks associated with their business activities. In addition to training, employees can direct questions or concerns about corruption to Group Legal through a dedicated mailbox.

4.2 Policies and standards

Danish Crown has implemented a policy and comprehensive standards to provide guidance to all employees. The policy and standards provide thorough instructions on how to ensure integrity when conducting business on behalf of Danish Crown.

In addition, Danish Crown has implemented regional guidelines and tools within the existing standards to ensure that employees working in higher risk functions or regions are equipped with the knowledge to avoid corruption or being perceived as corrupt.



5. Monitoring, reporting and review

5.1 Monitoring

Danish Crown has established a whistleblower protection scheme to ensure that any external or internal person or entity can report a corruption incident confidentially and without retaliation. Whistleblower reports are thoroughly investigated, and appropriate action is taken to address substantiated allegations.

We have implemented a disclosure management system to support our employees be transparent about conflict of interest, gifts, hospitality, travel expenses, facilitation payments and donations.

5.2 Reporting

Danish Crown has established reporting channels to ensure that commitments, activities, and changes are reported internally to the Danish Crown Audit and Risk Committee and externally in the Danish Crown Annual Report.

5.3 Review

The Anti-Corruption Compliance Programme and its underlying documents are reviewed and updated by Group Legal based on legislation, feedback from training sessions, feedback from management, and best practices in the field. These updates allow for the strengthening of compliance efforts.

5.4 Partnerships

Danish Crown is a member of the UN Global Compact, where Danish Crown actively cooperates with external stakeholders to share best practices and lessons learned in the fight against corruption. This partnership strengthens collective efforts to combat corruption and promote ethical business practices on a wider scale.