

Business Ethics &  
Anti-Corruption Policy  
HusCompagniet A/S



## 1 Scope and objectives

This policy applies to HusCompagniet A/S, CVR-no 36972963, and all consolidated subsidiaries (the “Group”) and is applicable to all employees of the Group, regardless of position or function.

The policy sets out the overall principles and ethical framework within this area and is supplemented by relevant operational policies, guidelines and procedures.

## 2 Purpose and principles

At HusCompagniet, integrity and responsible business conduct are fundamental to how we operate. We are committed to conducting our business in a lawful, ethical and transparent manner and to maintaining the trust of customers, employees, business partners and authorities.

As a construction company, we interact with customers, suppliers, subcontractors and public authorities across all phases of our projects – from planning and permitting to procurement and construction. We recognise that these interactions involve inherent risks related to corruption, fraud and unethical conduct.

We therefore work actively to prevent such risks and ensure that all decisions are based on objective, legitimate and documented business considerations. Employees are trained in this policy upon hiring and receive regular refresher training thereafter. Our approach goes beyond legal compliance and reflects a commitment to acting responsibly in all business relationships.

We do not accept any form of improper advantage, and we expect the same high standards from our business partners. These expectations are further defined in HusCompagniet’s Supplier Code of Conduct, which sets out the minimum requirements for responsible business conduct in our value chain.

## 3 Business ethics principles

HusCompagniet is committed to the following overarching principles:

This includes:

- Anti-bribery: We have a zero-tolerance approach to bribery in all forms. We do not offer, promise, give or accept any improper advantage, whether directly or indirectly, to influence decisions or obtain business advantages. This includes interactions with both public and private parties, as well as any form of facilitation payments.
- Fraud and dishonest conduct: We do not tolerate any form of fraud or dishonest conduct. This includes falsification of documents, manipulation of financial or project information, improper invoicing, kickbacks or any attempt to gain an unfair advantage in procurement or tender processes.
- Gifts and hospitality: Gifts and hospitality must always be reasonable, proportionate and related to a legitimate business purpose. They must never influence, or appear to influence, business decisions or create conflicts of interest. Detailed rules and thresholds for giving and receiving gifts and hospitality are set out in separate internal guidelines. Detailed rules and thresholds for giving and receiving gifts and hospitality are set out in separate internal guidelines.
- Conflicts of interest: Employees must avoid situations where personal interests may conflict with the interests of HusCompagniet. Any potential conflict must be disclosed and managed transparently.
- Books and records: All transactions and business activities must be accurately, completely and transparently recorded. We do not permit any false, misleading or incomplete records, nor any undisclosed or unrecorded accounts or payments. Documentation must reflect the true nature of transactions and comply with applicable laws and internal requirements.

- Anti-money laundering: We do not accept or facilitate money laundering or the financing of criminal activities. Transactions must be transparent, properly documented and conducted through approved financial channels.
- Compliance with laws and sanctions: We comply with applicable laws and regulations, including international sanctions, in all markets where we operate.

#### **4 Speak up**

HusCompagniet encourages all employees to speak up if they become aware of conduct that may constitute a breach of this policy. Concerns can be raised through the relevant internal channels, including line management, HR or the Group's whistleblower scheme.

HusCompagniet does not tolerate retaliation against employees who raise concerns in good faith.

#### **5 Consequences and non-compliance**

Compliance with this policy is mandatory.

Any breach of this policy may result in employment-related consequences, including a reprimand, warning, termination, or immediate dismissal, depending on the nature and severity of the breach.

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This Business Ethics and Anti-Corruption Policy has been adopted by the Board of Directors of HusCompagniet on 16 March 2022 and latest updated on 30 April 2026. The policy is available on HusCompagniets website.