



## **Anti-Corruption Policy**

Starting from the company's applicable HR Policy and ID®'s work in relation to responsible conduct, ID® acts in accordance with the following principle: "The company should work to counteract all forms of corruption, including economic exploitation and extortion".

ID® does not engage in illegal or anti-competitive activities in its dealings with its customers and suppliers, and it does not accept corruption or bribery as a means of gaining commercial advantages.

There is zero tolerance for corruption at ID®. ID® considers corruption in all its forms to be unethical and contrary to the core principles of ID®'s ethos and beliefs. This policy serves to provide ID® employees with clear rules of conduct in relation to our dealings with the company's customers, suppliers and partners, including rules on the acceptance of gifts and participation at paid-for events and entertainment.

## What is corruption?

Corruption is an umbrella term that covers unethical actions such as bribery, kickbacks, embezzlement, fraud, extortion and nepotism as well as other similar behaviours. Corruption therefore covers both the acceptance and offering of bribes as well as other forms of corrupt behaviour, both passive and active.

The classical understanding of corruption typically involves money in the form of undue demands or offers of payment in order to attain an ordinary benefit, special service or an advantage, but it also extends to other forms of conduct, including privileged access to a job or similar benefit.

## Who is covered by the anti-corruption policy?

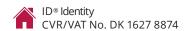
The policy applies to all employees who act on behalf of ID®. All employees are required to refrain from any activity which may lead to a violation of ID®'s Anti-Corruption Policy. It is management's responsibility to inform employees of the contents of ID®'s Anti-Corruption Policy.

## The anti-corruption policy

Gifts and similar representing a value of up to DKK 800 per gift can be accepted without the express authorisation of ID®'s management. Employees are not permitted to accept tickets, cash, items of clothing, consumer goods or other items that exceed this value.

As a general rule, employees are permitted to accept invitations for entertainment that include catering/food, refreshments, events, and transport and accommodation, provided

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the value of such entertainment does not exceed an estimated value of DKK 3,500 per occasion. Corporate entertainment exceeding this amount may not be accepted without the express authorisation of management. If an employee is unsure as to whether or not a gift or invitation is permitted under this policy, the employee should contact CEO Thomas Husted before accepting the gift or the invite to participate at the event or entertainment offered.

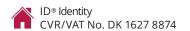
ID®'s employees have a responsibility to prevent, uncover and report corruption, and they are required to propagate the company's zero tolerance policy for bribery and corruption.

Management must be informed if an employee participates in a private event hosted by an ID® customer or supplier. Employees must be particularly vigilant of gifts in the context of a tender, contracting process or similar where there is a risk the gift may influence the decision-making process.

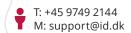
Always contact CEO Thomas Husted if in doubt.

Thomas Husted CEO

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