

## **Anti-Bribery & Anti-Corruption Policy – UN Target 17**

Steel Products A/S recognizes the importance of conducting business with integrity, transparency and honesty. We are committed to adhering to all applicable laws and regulations related to anti-bribery and anti-corruption. Our aim is to maintain a fair and ethical business environment that promotes trust and respect for our employees, stakeholders, customers and partners. This policy outlines Steel Products A/S's position on anti-bribery and anti-corruption and serves as a framework for all employees, business partners, suppliers and contractors to follow.

This policy supports UN sustainability development goal number:

- **17 Partnerships for the goals**

Steel Products A/S is committed to conducting business with integrity and in compliance with all applicable laws and regulations.

### **Bribery and Corruption Prohibition:**

Steel Products A/S prohibits any form of bribery, corruption or facilitation payments. No employee, representative or agent of the company shall, directly or indirectly, offer, promise, pay, request, or receive any bribe, kickback or other illegal payment to or from any person, including government officials, for the purpose of obtaining or retaining business, or gaining any improper advantage.

### **Gifts and Hospitality:**

Steel Products A/S recognizes that giving and receiving business gifts, entertainment and hospitality is an accepted part of business culture in many countries. However, it is important to maintain ethical standards and avoid situations that could be perceived as inappropriate. Therefore, all gifts and hospitality offered or received by our employees must be within reasonable limits and comply with local laws and regulations.

The following guidelines must be followed:

<b>Document owner:</b>	Tine Valente	<b>Page:</b>	1 of 3
<b>Author:</b>	Per R. Schmidt	<b>Revision:</b>	3
<b>Revised by:</b>	Tine Valente	<b>Date of revision:</b>	22.06.2018

- Gifts and hospitality must be offered or received openly and transparently.
- Gifts and hospitality must be of nominal value and consistent with customary business practices.
- Gifts and hospitality should not be offered or received in exchange for or with the expectation of any improper advantage.
- Employees should disclose to their supervisor any gifts or hospitality received that exceed a nominal value, regardless of the source or occasion.

### **Political Contributions:**

Steel Products A/S respects the political processes of the countries where it operates. However, political contributions must be made in compliance with all applicable laws and regulations. Political contributions by Steel Products A/S will be transparent and publicly disclosed as required by law.

### **Due Diligence:**

Steel Products A/S conducts due diligence on all potential business partners, including suppliers, distributors, agents, consultants and other intermediaries, to ensure that they have a reputation for ethical behavior and compliance with anti-bribery and anti-corruption laws. The company reserves the right to terminate relationships with any business partner found to be in violation of this policy.

### **Reporting and Investigation:**

Steel Products A/S encourages all employees, business partners, suppliers and contractors to report any suspected violations of this policy or any other unethical behavior. Reports may be made confidentially and anonymously. The company will investigate all reports promptly, thoroughly and objectively, and take appropriate corrective actions as necessary.

<b>Document owner:</b>	Tine Valente	<b>Page:</b>	2 of 3
<b>Author:</b>	Per R. Schmidt	<b>Revision:</b>	3
<b>Revised by:</b>	Tine Valente	<b>Date of revision:</b>	22.06.2018

## Training and Awareness:

Steel Products A/S provides training and awareness programs to key employees, business partners, suppliers and contractors to ensure that they understand the company's policy on anti-bribery and anti-corruption, and their role and responsibilities in maintaining a fair and ethical business environment. The training covers the following topics:

- The legal and ethical framework of anti-bribery and anti-corruption laws.
- The types of activities that are prohibited by this policy.
- The types of gifts and hospitality that are acceptable and the reporting requirements.
- The due diligence process for selecting business partners and intermediaries.
- The reporting and investigation process for suspected violations.

## Management Oversight:

Steel Products A/S's management is responsible for overseeing the implementation and enforcement of this policy. Managers are responsible for ensuring that their employees understand and comply with this policy, and for reporting any suspected violations to the appropriate channels. The company's senior management is responsible for monitoring compliance and ensuring that appropriate corrective actions are taken as necessary.

<b>Document owner:</b>	Tine Valente	<b>Page:</b>	3 of 3
<b>Author:</b>	Per R. Schmidt	<b>Revision:</b>	3
<b>Revised by:</b>	Tine Valente	<b>Date of revision:</b>	22.06.2018