

MESSAGE

Appendix 7: Anti-Corruption Policy

Our commitment

MESSAGE A/S is committed to adhere to the UN Convention Against Corruption. This commitment is expressed towards our suppliers and business partners and internally to ensure that everyone is acting in accordance with the same ethical standards.

Definition of corruption

Corruption is defined as the abuse of entrusted power for private gain.

Corruption is not always about money, it can also be for example preferential treatment, extra service to gain an advantage.

Employees of MESSAGE A/S and our partners must avoid these situations of corruption:

Conflict of interest:

- This arise 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.
- MESSAGE A/S 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 MESSAGE A/S must not seek to influence any person or body by using their position or by using force or threats.

Fraudulent behaviour:

- Fraudulent behaviour involves deliberately being dishonest or misleading, engaging in deceitful behaviour or acting under false pretences.
- Employees at MESSAGE A/S must not exercise such behaviour under any circumstances.

Receiving gifts and hospitable behaviour:

- 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 general rule, employees should not receive gifts or other benefits in connection with their work. However, giving small gift 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 MESSAGE A/S must not give, solicit or receive directly or indirectly

Nepotism:

- Nepotism is incidents where family and friends are favoured and treated advantageously due to close personal relations, rather than on the basis of a professional assessment of their capabilities.
- Employees of MESSAGE A/S must not favour friends, family or other close relations in recruitment, procurement, or other situations.

All employees 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 programmes or projects.

They are also obligated to notify their superior about potential or current conflicts of interest.

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