

Anti-Corruption Policy

Coze Aarhus A/S (in the following referred to as Coze) values trust highly and strives for the highest level of integrity, both internally as well as for producers and suppliers.

We have a zero-tolerance approach to bribery and corruption and strive to ensure that national legislation is being followed wherever we do business.

Coze is a member of amfori BSCI, and our Anti-Corruption Policy towards buying agents and suppliers is reflected in our use of the amfori BSCI Code of Conduct.

We expect our business partners to respect this policy and to practice similar measures in their own business operations.

Who is responsible for this policy?

The executive management at Coze has the overall responsibility for this policy, but the daily responsibility for implementation and monitoring lies with the "Quality and Compliance" department, headed by the company's CPO. Quality and Compliance is responsible for the communication of our anti-corruption approach to suppliers and producers.

Who must comply with this policy?

The policy applies to all personnel working for us, including employees and management at Coze as well as people working on our behalf as business partners. It is the responsibility of each employee and business partner to;

- * read, understand and comply with this policy
- * avoid any business activity that can lead to a breach of this policy
- * inform the management if there is reason to suspect that a conflict with this policy is about to occur/has occurred.

What are corruption and bribery? *1

Corruption is the abuse of entrusted power for private gain.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.).

Coze do not accept corruption or bribery in any form.



Facilitation Payments

Facilitation payments are often small, unofficial payments, with the purpose of securing or expediting a routine or necessary action (e.g. by a government official).

If faced with a demand of facilitation payment, the matter must be declared to immediate manager and comply with their instruction, as well as registered for internal record keeping.

Coze must be informed by the buying agents/producers as to where in the supply chain facilitation payments are requested in order to find solutions for how to avoid this.

Hospitality and gifts

Hospitality is the giving of entertainment and other benefits. This includes events, activities, travel and accommodation. Gifts are things received by producers or suppliers such as garments, food or items.

This policy does not prohibit the giving or acceptance of reasonable and appropriate hospitality for legitimate purposes, if:

- * it is appropriate and reasonable under the circumstances
- * it does not involve cash or cash equivalents
- * it is not made with the intention of influencing improperly the outcome of business transactions.

For gifts it is acceptable with a maximum amount of 30 EUR.

Hospitality is difficult to define amount wise, but reasonable restaurant visits and entertainment are acceptable.

All hospitality and gifts are registered by the employee in a record for this.



Business Relationships

This policy will be communicated to our business partners together with our Cooperation Agreement and Code of Conduct. A signed Cooperation Agreement, in a version from 2020 or later, is an acceptance of our Anti-Corruption Policy from the signing company.

It is the responsibility of our business partners to ensure compliance with this policy.

All kinds of corruption and bribery are strongly forbidden. Buying agents and suppliers must understand that this kind of activity may result in

- * immediate termination of the cooperation
- * information sharing with authorities and organizations
- * legal proceedings.

Sanctions

Non-compliance to any of the points in this policy will lead to sanctions or disciplinary actions.

No retaliation will be done to a person that informs about non-compliance to our Anti-Corruption Policy.

No employee will be penalized or be subject to other adverse consequences for refusing to pay bribes, even if it may have impact on the business of Coze.

Breaches of this policy will not be tolerated.

1. Definitions by Transparency International; (the leading international NGO in curbing corruption) <https://www.transparency.org/lossa>

Risskov, 25/5 2020


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