

# Position on Anti-Corruption

*Introduction* One of the values of Chr. Hansen is that we are open and honest in the way we do business and have good commercial practices.

Therefore, Chr. Hansen does not accept or tolerate bribes in any form whether directly or indirectly or through agents or other third parties.

*Statements* Our position on Anti-Corruption encompasses:

#### Bribery and Facilitation Payment is Prohibited

 $\cdot$  We do not offer, promise, give or demand a bribe, unlawful facilitation payment or other undue advantage to obtain or retain business or any other improper advantage neither as an employee nor as a business.

### **Money Laundering**

 $\cdot$  We do not involve in financial transactions derived from or to be used for criminal activities.

### **Protection Money**

 $\cdot$  We do not pay protection money in any form.

#### Gifts

 $\cdot$  We believe that gifts should always be reasonable. Gifts are only acceptable to the extent that they do not improperly affect a specific business transaction.

# Entertainment

 $\cdot$  We believe that hospitality and expenses always should be reasonable and be done openly and with a specific business purpose.

# Political and Charitable Contributions

 $\cdot$  We do not make financial contributions to political parties or political causes. We do allow charitable donations subject to established procedures.

Scope

The principles apply to all employees, directors and officers in Chr. Hansen as well as agents/distributors, intermediaries, joint ventures and outsourcing agreements.



Explanation of statements

### Direct or Indirect Bribery

Chr. Hansen does not only prohibit bribery (or attempts to bribe) within its operations in direct contact with third parties, we also do not accept bribery carried out through intermediaries. Bribery is an offer or receipt of any gift, loan, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, while conducting the company's business.

### **Facilitation Payment**

They are small payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement. Such small payments are also called "speed" or "grease" payments.

# Money Laundering

All business relationships involving financial transactions shall be documented. Accurate books and records, which document all financial transactions must be maintained.

### Gifts

Gifts can be money, goods, services or loans given as a mark of friendship or appreciation. A gift is given without expectation of consideration or value in return and may express common purpose and the hope of future business success. Used as marking, enhancing relations or promoting the company (items with logos etc.). Local policies should always be followed and value amounts above EUR 100 should be approved by an EVP/CVP.

#### Entertainment

Includes meals, receptions, tickets to entertainment, social or sporting events, participation in sporting events, such activities being given or received to initiate or develop a relationship between Chr. Hansen and customers. The distinction to gifts may be blurred, especially where the provider of the entertainment does not attend and act as host. Local policies should always be followed and value amounts above EUR 200 should be approved by an EVP/CVP.

# **Political Contributions**

Include any contribution, made in cash or in kind, to support a political cause.

# Charitable contributions

Donations to charitable events include any contribution in cash or in kind to support a charitable cause, if the donation is not used as a vehicle to conceal payments to corruptly influencing foreign officials. Proper risk-analysis needs to be made upfront, and the donation must be approved by an EVP/CVP. All donations must be properly recorded in the books and records of the relevant local affiliate.



### Management Approval of distributors/agents and intermediaries

All distributors/agents and intermediaries shall sign the Chr. Hansen Anti-Corruption Position.

#### Internal Audit and Controls

Regular internal audits shall be performed with the purpose of ensuring effectiveness of the Anti-Corruption program.

#### Whistleblower Hotline

Chr. Hansen's Whistleblower Hotline for reporting of any illegal or unethical misconduct is available at <u>www.chr-hansen.com/en/whistleblower.</u>