



Group policy on anti-corruption

At the Polar Seafood Group, we aim to grow and operate our business in a fair and legal manner, for which reason we have an unequivocal stance on and zero tolerance for corruption and bribery.

OUR POSITIONS

Bribery

We do not accept our employees offering, giving or receiving anything of value for the purpose of influencing the recipient's decision or behaviour – neither money, gifts, services, favours nor other benefits.

We wish our customers to buy our products because of their price and quality – not because we pay them to do so. The same applies when we purchase goods and services ourselves, or carry on trade between companies in the Group.

Facilitation payments

We do not accept facilitation payments of any kind, whether directly or via third parties. Regardless of where we are in the world, and regardless of whether or not it is prohibited by local law.

Although facilitation payments are typically small amounts intended to speed up a process, we consider them as bribes. All payments are therefore subject to strict supervision.

Gifts

We do not give or accept large gifts or cash.

We accept only the receiving or giving of non-cash gifts of limited financial and primarily symbolic value, for representative purposes and as an expression of politeness, common courtesy and hospitality.

Gifts should never be given or received if they could influence the recipient to take a specific business decision.

Representation

Employees of the Polar Seafood Group are allowed to participate in a responsible manner in dinner events, etc., or have a drink with business partners. However, we do not accept the giving or receiving of entertainment of a higher value – such as holiday trips.

Political and charitable contributions

The Polar Seafood Group does not donate money to political parties, but we support specific charitable causes.

Our support to charitable causes is never given with the expectation of increasing sales of our products, or promoting other business aims.

Conflicts of interest

We expect all our employees to use their common sense and judgement to avoid conflicts of interest between their own interests and the interests of the Polar Seafood Group.

We will not therefore accept an employee using his or her position in the organisation to obtain undue personal benefits, or to work for interests other than those of the Polar Seafood Group.



OUR EFFORTS

We define corruption as the abuse of entrusted power to influence or promote particular actions for commercial or personal gain. Corruption does not necessarily have to involve money or gifts – it can also be about favours, such as preferential treatment, special protection, extra service or shorter processing times. It may also involve gifts or favours that appear to obligate the recipient to return the favour.

In accordance with the 2011 OECD Guidelines for Multinational Enterprises, we will actively and continuously monitor the risk of corruption in our business and in our business relations.

All employees of the Polar Seafood Group have a duty to report all cases of suspected or known corruption and bribery to management.

We require all our business relations to adhere to the global minimum standard for responsible business behaviour, and thereby tackle the risk of corruption through established processes, as described in our Code of Conduct.

A VISIBLE POLICY

The management of Polar Seafood is responsible for ensuring that the Group's anti-corruption policy is known and complied with both internally and with our business relations.

New employees are familiarised with the policy when they are recruited, managers must know and practise the guidelines locally, and the status and results of the policy are reported at least once annually to the Board of Directors.

We take our responsibility seriously and raise awareness of our efforts to improve our systems to prevent, identify and mitigate any negative impacts on our anti-corruption efforts in the Group.

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