

# The Nordomatic Policy **Anti-bribery and Corruption**

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## About the Policy

This policy ensures that Nordomatic complies with all applicable anti-bribery and corruption laws and conducts business responsibly. It applies to Nordomatic's operations globally and all employees and business partners.

Nordomatic has a zero-tolerance policy regarding any activity that is or could be considered bribery or corruption, and will never accept, facilitate, or otherwise support such activities.

## Nordomatic Employees

Nordomatic and its employees may not directly or indirectly offer, promise, authorise, provide, request, accept, or receive bribes, gifts, benefits, or anything else of value intended to or that could be reasonably expected to cause Nordomatic to obtain or retain business, secure a commercial advantage, or that will otherwise influence any decision.

## Third parties and other affiliates

Third parties include, but are not limited to, any business partner, supplier, or contractor. Nordomatic can be held responsible for the conduct of its business partners, and we exercise due care when engaging with them.

We expect all third parties representing Nordomatic to comply with this policy and anti-corruption laws. Concerns or deviations will be investigated, and necessary actions will be taken to eliminate or mitigate bribery and corruption risks with business partners.

## Government Bribery

Reasonable corporate hospitality acceptable to other business associates might not be acceptable when such individuals are involved. The definition of what could constitute a bribe to a Government Official is broad and can be anything of value, even minor items like gifts, entertainment, or business meals. As a rule, no gift should exceed 50 EUR, but this limit may be lower in some countries.

At Nordomatic, it is strictly prohibited to offer, promise, authorise, or give any gift, payment, or benefit to Government Officials (including their

family and close associates) to influence their behaviour or decisions.

Hiring or engaging a government official, commercial partner, or immediate family member to influence the official or in exchange for any favour or benefit is never permissible.

## Facilitation Payments

Facilitation payments are small payments to Government Officials to expedite routine services such as visa applications and customs clearance. Nordomatic strictly prohibits making, authorising, or accepting these payments directly or indirectly. All requests for facilitation payments must be reported to your direct manager.

## Commercial Bribery

Nordomatic prohibits employees from offering or providing corrupt payments and other advantages to or accepting the same from private (non-government) persons and entities. Such payments constitute commercial bribery and are often called "kickbacks".

## Donations and sponsorships

Charitable contributions and sponsorships must be for a legitimate charitable purpose.

It is never permissible to provide a donation to influence (or to sponsor) a public figure, candidate for public office, or government official in exchange for any favour or benefit. Prior approval from the local Finance Director is required before donating to a government agency as part of a charitable effort.

## Political Contributions

Nordomatic does not permit the use of company funds for political contributions.

## "Anything of Value"

A bribe may take many forms and need not be cash. "Anything of value" includes, on a non-exhaustive basis, cash or cash equivalents such as gift cards, gifts, meals and refreshments, entertainment, lodging, trips and travel-related expenses,

employment offers or referrals, internships, product discounts, loans, the forgiveness (or cancellation) of debts and any other transfer of value, even if nominal.

## Hospitality and Gifts

Hospitality and gifts (given or received) should be offered or accepted only if permitted under applicable laws. Hospitality includes entertainment, meals, travel, and accommodation. In all cases, it should be insubstantial in value, transparent, well-documented, and appropriate for the relationship between the parties, with no intention of influencing decision-making. Insubstantial value can vary by country but shall never exceed EUR 150 per person (private sector; see the limits for government officials above).

Gift and hospitality expenses should be recorded transparently in the financial records, e.g., using a specific account for each expense type; the text field should include the recipient's name, purpose, and any possible involvement of public officials.

## Discounts, Rebates, Commissions, and Bonuses

Discounts, Rebates, Commissions, and Bonuses should be in writing and commercially reasonable.

## Conflict of Interest

Nordomatic employees must avoid situations that may create or appear to create a "conflict of interest". A conflict of interest occurs when an individual or organization has competing interests or loyalties that could influence their decisions, actions, or judgment in a way that compromises their integrity or responsibilities.

Conflict of interest typically arises when personal, financial, or other private interests interfere with the impartiality or objectivity required in a professional or official capacity. Any potential conflict of interest must be disclosed promptly to your manager.

## Mergers and acquisitions

Mergers and acquisitions pose potential risks, as Nordomatic may be liable for past misconduct of acquired entities. To mitigate this risk, Nordomatic

conducts anti-bribery and corruption due diligence in all mergers and acquisitions and ensures full compliance with this policy post-acquisition. Employees report any suspicions of a violation of this policy and anticorruption laws and regulations.

## Roles and Responsibilities

Each employee is responsible for acting in accordance with this Policy, and every line manager is responsible for ensuring each team member has access to this Policy and for undertaking adequate efforts to prevent and detect bribery and corruption.

## Raising Concerns

Any concerns should be reported to your local manager or Country Director, and precautions/actions must be taken to eliminate or mitigate the risk of bribery and corruption.

If the issue/concern remains unresolved, you can make a confidential and/or anonymous report online at our whistleblower channel (see [Group Intranet – Home](#)),

Employees who refuse to accept or offer a bribe, raise concerns, or report another's wrongdoing are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, regardless of the outcome of investigations.

## Sanctions and Disciplinary Actions

A violation of anti-corruption laws can lead to severe civil and criminal penalties and reputational harm to Nordomatic. Employees who violate these laws can also face severe civil and criminal penalties, including jail time. A violation of this policy may result in disciplinary action, including but not limited to termination of employment.

## Training

Anti-bribery training is mandatory for all business area managers, business unit managers, project managers, procurement personnel, sales personnel, and employees with specific supplier and/or vendor contacts.

We provide online training, which enables us to:

- ✚ Explain what constitutes bribery
- ✚ Inform of the damage that bribery can do to our organisation and society
- ✚ Recognise how and where bribery risks arise
- ✚ Take steps to avoid and resist demands for bribes

## Local Regulations

Additional local instructions may support this internal policy. Refer to the local intranet for further guidance.

## Review and Update

This policy is reviewed and updated annually to remain relevant and practical. All employees, suppliers, and partners are expected to understand and uphold the principles outlined in this policy.

## How to contact us

Please contact your direct manager with any questions regarding our Anti-Bribery policy.

## Key Messages

**Do not offer any gift to any decision-maker or influencer to win business, and do not accept anything inappropriate from a supplier or agent.**

**At Nordomatic, we do not offer, promise, authorise, provide, request, accept, receive, or pay bribes or any other form of value, directly or indirectly, to influence a decision, obtain or retain business, or secure an improper advantage.**

Entertainment and gifts (given or received) should be offered or accepted only if per local legislation and our principles—i.e., they should be limited in value, transparent, for a business purpose, well-documented, and appropriate for the nature of the business relationship with no intention of influencing decision-making.

Expenses involving Government Officials should be closely monitored. Reasonable corporate hospitality acceptable to other business associates might not be acceptable when government officials are involved.

Business representation should be used only for legitimate business purposes and on reasonable terms\*.

Discounts, Rebates, Commissions, and Bonuses should be in writing and commercially reasonable.

Nordomatic does not make political contributions.

Charitable contributions must be for a legitimate purpose.

Nordomatic can be held responsible for the conduct of its business partners. Exercise due care when engaging with business partners – i.e., concerns or “red flags” should be investigated, and precautions/actions should be taken to eliminate or mitigate bribery and corruption risks related to business partners.

Reasonable terms mean the value of Euro 150 per person. The value of gifts, given or received, may not exceed Euro 150 (the limit for Government Officials is Euro 50).