

**Date**

April 2020

Title

Policy for the receipt of gifts, participation in events, and anti-corruption

Background

TDC strongly supports free and fair competition on open and transparent terms and does not accept business deals to be entered into on a dubious or illegal basis, neither in the event that TDC delivers goods or services to others nor in the event that goods or services are delivered to TDC.

The objective of TDC's compliance rules are to ensure that the value of gifts and other benefits, which are accepted or given, is at a reasonable level and on a transparent basis.

The compliance rules apply to all employees in the TDC Group, Nuuday, and TDC NET, including executive directors and managers.

Receiving Gifts

Gifts, Christmas gifts, restaurant visits, client trips, sponsorship trips or other benefits to TDC employees, can only be accepted if they are not exceeding DKK 500.

Gifts, restaurant visits, client trips, sponsorship trips or other benefits which exceed a value of DKK 500, can only be received after written approval from a director of TDC. If director approval cannot be obtained, the gift shall be returned.

It is not acceptable that events or restaurant visits take place repeatedly – this includes the employee's participation in regular events on an ongoing basis even if each event is below the limit of DKK 500.

Participation in social events and meetings with external parties, which do not concern a specific case as for instance client meetings, must be reported by the TDC employee to TDC Compliance function. Examples hereof are: participation in sport events, bicycle events etc. Reporting must take place regardless of the value of the event.

A TDC employee's participation in a business trip with a business partner, supplier or client must be reported and accepted by the employee's manager before the trip takes place. TDC will pay all related expenses in connection with the employee's trip, accommodation etc.

Gifts for colleagues and managers, for instance in connection with anniversaries, retirements or job change, are usually private gifts and thus these cannot be paid by TDC.

Depending on the circumstances, an employee's manager may give an employee who celebrates a job-related event a smaller gift paid by TDC.

Employees may never seek or ask for gifts, trips, stays or other kinds of appreciation. It is, however, acceptable that suppliers etc. may sponsor smaller gift items such as t-shirts, jackets etc. in connection with, for instance, department events.

Employees may not, either directly or indirectly, be a supplier to TDC unless the relationship has been pre-approved by the executive vice president for that area.

A supplier agreement contracted with an employee must always be entered into by both parties before the actual supplier cooperation is entered into.

Anti-corruption

TDC strongly supports free and fair competition on open and transparent terms and does not accept business deals to be entered into on a dubious or illegal basis, neither in the event that TDC delivers goods or services to others nor in the event that goods or services are delivered to TDC. Furthermore, TDC does not accept that political or regulatory decisions on framework conditions which directly or indirectly affect TDC's business are sought or affected by the use of dubious or illegal methods.

TDC takes a zero-tolerance approach to corruption in any form.

Further, TDC does not accept that the Group or the employees offer or accept any kind of bribery.

TDC does not directly grant financial support to political parties or their candidates. TDC does, however, accept that trade organisations, which TDC is a member of, may grant financial support to political purposes on behalf of the organisation in question. Also, TDC does not make donations to other causes that would provide a deliberate unfair business advantages.

TDC is committed to comply with the United Nations Convention against Corruption, see: [The Merida Convention on anti-corruption](#).

TDC has signed [United Nations Global Compact, which among other things deals with corruption \(principle 10\)](#).

Furthermore, TDC has a [Code of Supplier Conduct, which concerns anti-corruption \(principle 10\)](#).