

# Prevention of bribery in EIFO and in EIFO's business transactions (for public use)

## EIFO as a business partner

EIFO has a commercial and ethical obligation to ensure a high degree of transparency in the business transactions that we are involved in. Based on the national and international set of rules within this area, we impose requirements on our business partners to prevent bribery in the transactions that EIFO participates in.

EIFO is subject to the anti-bribery rules stipulated in the Danish Criminal Code as well as the obligations described in OECD's Convention on Combating Bribery of foreign Public Officials in International Business transactions (OECD Convention on Bribery) ratified by Denmark.

In addition to this, EIFO has implemented the obligations which result from OCED's code of practice on prevention of bribery in export credit transactions (Recommendation of the Council on bribery and officially supported export credits).

Moreover, we refer to EIFO's policy on environmental, social, and corporate governance which is available on EIFO's website where you will find a description of EIFO's approach to the transactions that we take part in.

## EIFO's provisions against bribery

As part of EIFO's compliance with the international anti-bribery obligations and based on EIFO's own risk assessment, EIFO has established an internal process for the prevention of bribery in the transactions that EIFO participates in. Thus, EIFO has established a set of internal rules and regulations within the area which applies to all EIFO's employees. In addition, EIFO has established an internal risk management system which contributes to screening and due diligence of all relevant parties in the transactions that EIFO is involved with.

EIFO encourages all business partners, including exporters, banks and borrowers and other relevant parties to develop, apply and document suitable control systems that can contribute to prevention and identification of bribery.

#### Screening of all parties and due diligence

EIFO conducts a screening of all relevant parties in the transactions that EIFO participates in. In connection herewith, EIFO demands that the relevant party submits information on factors which may indicate a potential increased risk of bribery as well as signing a Declaration on Non-bribery.

EIFO conducts an independent due diligence of the relevant parties based on specific risk factors. In certain cases, EIFO may find that an extended due diligence of the relevant party is required. This may induce EIFO to ask for further information or documentation.

#### EIFO's participation in transactions

EIFO can only take part in a transaction if screening and/or due diligence has been concluded with a result deemed satisfactory by EIFO seen in relation to the risk of bribery.

## **EIFO as a workplace**

EIFO has implemented internal rules which prevent employees from accepting or offering gifts and services that may be classified as bribery.

#### Internal rules

EIFO's employees must not receive or offer gifts or services which may be regarded as bribery. This applies to, for instance, exchange of cash, bonds, trips, entertainment, and gifts of considerable value as well as contributions to charity or favourable publicity etc.

#### Gifts and events

Hospitality and offering of small symbolic gifts may be part of normal business conduct. As a rule, EIFO does not receive or offer gifts of significant value and does not participate in social events which may be regarded as a significant gift. If there is a clear, professional justification for participation in a social event, EIFO will cover the expenses related to the event, i.e., expenses related to travel, accommodation, and fees.