

### Anti-corruption policy

Tryg takes distance from all forms of corruption and bribery, both in relation to customers and other partners. Furthermore, Tryg distances itself from the use of undeclared work, for instance by suppliers or other partners.

Anti-corruption in Tryg is managed by ensuring specific guidelines that advise our employees as well as partners in making ethical decisions.

Structures that ensure anti-corruption and good corporate governance are defined in the Tryg Code of Conduct as well as integrated in contracts with suppliers and partners.

### Tryg Code of Conduct

The Tryg Code of Conduct on anti-corruption states that Tryg employees and everyone acting on behalf of Tryg should comply with existing anti-corruption legislation. Tryg has zero-tolerance as a requirement in relation to both customers and partners.

All new employees are informed and trained in the Tryg Code of Conduct and the anticorruption policy within Tryg.

The Tryg Code of Conduct states the following on Anti-Corruption:

Tryg wants to ensure that:	We expect our employees to:
<ul style="list-style-type: none"> <li>• Tryg complies with existing anticorruption legislation</li> <li>• Tryg employees and partners are familiar with rules introduced to avoid bribery, money laundering (Norway*), including rules on gifts, sponsorships and representation</li> <li>• Gifts, sponsorships and representation are not used to execute indecent influence on partners and customers</li> <li>• Our employees are not allowed to make decisions based upon reception of gifts or the likes from our partners and customers</li> <li>• Tryg's partners are familiar with our attitude towards undeclared work</li> </ul>	<ul style="list-style-type: none"> <li>• Familiarise themselves with and abide by Tryg's rules with regard to travel, representation, gifts and sponsorships</li> <li>• Counter corruption in the contact with our stakeholders, including refraining from accepting any kind of gift or service which represents more than a trivial value</li> <li>• Counter corruption in the contact with our stakeholders, including refraining from paying any form of bribe regardless of size</li> <li>• Not give any sponsorships or other gifts, unless in accordance with the guidelines</li> <li>• Pay special attention to suspicious transactions which may have character of money laundering (Norway only*)</li> </ul>

\* Money laundering (only applies to Norway) shall be understood as any action, the purpose of which is to change the character of the source of the money from an illegal source (criminal act) to appear to be a legal source are considered.

### Anti-corruption in sourcing

All suppliers have the responsibility to report on anti-corruption and good governance.

In our procurement provision and in contracts and co-operative agreements a proviso is included on Tryg's social responsibility performance. The suppliers are expected to comply with international standards on social responsibility report on their CSR performance. These

obligations include environmental impact and CO2 emission, the number of discrimination cases and equality initiatives, human rights screening of sub-suppliers as well their initiatives on prevention of corruption.

The reporting is made by each individual supplier in a database, and the suppliers who are required to report are monitored on an annual basis.

### **Ethical hotline**

Tryg has a whistleblower function, which is established to ensure that any concerns about illegal acts or conduct not in compliance with legal requirements and Tryg's own rules are investigated thoroughly.

The purpose of Tryg's whistleblower line is both to avoid that information about illegal conduct etc. is kept secret, and also to ensure that such information is passed on to the right persons in our organisation.

These guidelines should be seen in conjunction with other measures supporting Tryg's core value of being a reliable company in which all stakeholders can rest assured that nobody tries to conceal or suppress crucial information.

The Ethical Hotline can be used to report matters relating to Tryg by anyone with connection to Tryg, including customers, suppliers, partners and investors. Knowledge and suspicions about violations can be reported via <http://tryg.whistleblowernetwork.net/>.