

Anticorruption Policy

At DIGNITY, we are constantly working to achieve the highest standards of integrity and work ethics amongst our employees, as well as ensuring proper management of the funds we receive from our donors.

Therefore, DIGNITY has a zero-tolerance policy with regard to corruption in all its forms.

Our anti-corruption policy applies to all employees, partners and consultants. The policy was developed taking inspiration from the Anti-corruption policy of the Danish Ministry of Foreign Affairs.

Corruption is defined as an abuse of power for the sake of one's own personal gain. The term covers a number of actions such as bribery, fraud, embezzlement, mandate fraud and nepotism. Some of these actions are punishable under the Danish Criminal Code, and actions in violation of DIGNITY's anti-corruption policy could have repercussions for an individual's employment.

To maintain the highest standards of integrity and work ethics, we will:

- avoid conflict – actual or potential – between our personal interests and DIGNITY's interests (conflict of interests)
- not give or accept bribes of any kind
- not seek to influence – for personal gain – persons or regulatory bodies etc. by abusing our position, by force or using threats (extortion)
- not use deception, cheating or breach of trust to gain an unfair or dishonest advantage (fraud)
- not unlawfully acquire or otherwise misuse property or funds entrusted to us (embezzlement)
- not, directly or indirectly, give, solicit, or receive gifts or other benefits that may be construed as an attempt to influence the performance of our functions, duties or judgment. We will continue to be able to accept ordinary hospitality and small tokens of appreciation (gifts)
- not favor our friends, family, or other close relationships when hiring, purchasing, providing assistance or in similar situations (nepotism)

If an employee has doubts as to whether his or her actions may constitute corruption, the employee must contact his/her personnel manager as soon as possible for sparring and guidance. If the personnel manager cannot be contacted, the employee must immediately contact another manager from the management team.

What you must do

- You must always immediately contact your personnel manager if you suspect instances of corruption. Alternatively, you can approach the HR Manager.
- If the suspicion is directed at your own personnel manager, then contact the CEO immediately
- If the suspicion of corruption is directed at the CEO, then contact the Deputy Director immediately who, in turn, will contact the Chairman of the Board.
- You can read more about the subsequent steps in the process below.

What we will do

The anti-corruption policy forms part of DIGNITY's staff handbook, which is mandatory reading for all employees. In addition, in order to raise employee awareness of the policy, DIGNITY's HR team, in collaboration with the management group, is responsible for ensuring that the policy – as with other DIGNITY policies – is regularly discussed in various forums i.e. departmental meetings

DIGNITY's Anti-Corruption Code of Conduct is appended to all collaborative contracts entered into by DIGNITY. See the annex her [link to Appendix B].

DIGNITY's management is responsible for ensuring there is swift follow-up on suspected cases of corruption. Therefore, management must be involved IMMEDIATELY when suspicion of corruption arises, and it is management who determine what measures are to be taken in order to investigate whether corruption has taken place, including whether a complaint to the police should be filed. If it is found that corruption has indeed taken place, it is also the responsibility of management to decide what employment repercussions this will have for the employee involved.

Management must make sure that any relevant donors are informed of the situation. The time of the notification will depend on a concrete assessment of the content and strength of the relationship with the donor in question, but as a rule, they should be notified as early as possible in the investigation phase.

If an employee suspects that corruption has taken place, he/she must immediately contact his/her manager. If the suspicion of corruption relates to another DIGNITY employee, the following process is initiated:

The investigation phase:

More often than not, a case of corruption will start with a suspicion thereof. It is crucial that the investigation is carried out by means of a professional and objective process in which the rights of the suspected employee are respected. A suspicion may prove to be unfounded, and being unjustly suspected is an incredibly difficult situation for an employee to be in.

At the same time, the investigation must reflect the gravity of the suspected case of corruption in any of its forms. Therefore, DIGNITY will undertake the necessary investigations without undue delay and devote the necessary resources to do so. The investigation may involve external assistance in the form of, for example, DIGNITY's auditor or the police, if a complaint is filed with them.

The investigation phase comprises the following procedural steps:

- The relevant personnel manager is responsible for informing the CEO and the Deputy Director IMMEDIATELY of the suspicion
- Decisions on how to conduct the investigation and what it should entail are made by the CEO and the Deputy Director in collaboration with the relevant personnel manager
- The Deputy Director ensures that the HR Manager is involved and assists in the process. If it concerns financial matters, the same applies to the Finance Department's team leader
- If there is strong suspicion of a potential criminal offence, a police complaint should be made as soon as possible (the HR Manager prepares the report and serves as the contact person for the police). The ongoing process is then coordinated with the police

- If a dialogue with the suspected employee regarding the pending suspicion is deemed necessary, the employee should, as a rule, be given a short oral briefing by his/her personnel manager on the nature of the imminent interview. Afterwards, the employee is invited to a more formal employment interview and is given the opportunity to have an assessor present.
- Employment law steps can be taken while the investigation is underway, if management deems it necessary. This could involve, for example, changes to the tasks and responsibilities of the employee or dismissal/suspension.

The decision phase:

If a given suspicion of corruption proves to be substantiated, the CEO, the Deputy Director and the relevant personnel manager will determine the consequences of the action for the suspect's employment. For example, a decision may be made to expel, dismiss, warn or prosecute, and a claim for damages may be brought against the violating employee.

The process and decision regarding employment consequences are subject to confidentiality.

In cases of a particularly serious criminal nature, a police report may result in the suspect being arrested at the workplace by the police. This could happen within such a short timeframe that the management will face challenges when it comes to planning how to handle the situation within the organisation generally. The management, supported by the HR Manager, will always – to the extent possible – endeavour to plan how they will handle the situation before it occurs. The situation will remain confidential, despite the fact that the suspect may be arrested in full public view. Therefore, management will determine the most appropriate way of informing the other employees while being mindful of the confidentiality that restricts communication about what has taken place.

If an employee is convicted of a violation of the Danish Criminal Code, the employee will, in principle, be expelled or dismissed. Whether a decision is made to terminate employment before a verdict has been given (i.e. if an employee is charged or prosecuted under the rules of the Danish Criminal Code) will depend on a specific assessment.

Before the decision is announced to the employee, the CEO confidentially informs DIGNITY's Chairman of the Board of the employment consequences of the employee's actions in violation of the anti-corruption policy, including the outcome of the investigation phase.

Recapitulation phase – following the decision to initiate legal measures in respect of the suspect's employment following violation of the anti-corruption policy

If a suspicion of corruption is confirmed and legal employment-related measures are initiated against the employee, this will be a confidential personnel matter. Therefore, management has limited options in terms of informing the other staff as well as the outside world of the case. If the employee's contract has been terminated, the management may report this, but they may not disclose the reason for the termination.

If deemed relevant, management may choose to go over the anti-corruption policy with employees again. The management must also inform employees if the criminal act has involved partners (see also below) and what consequences this will have in the future.

Suspicion levelled at a collaborative partner

We prevent corruption on the part of our collaborative partners by constantly focusing on:

- Internal auditing and monitoring of quarterly financial reporting
- External auditing of annual project accounts
- Ensuring that collaborative partners are familiar with DIGNITY's anti-corruption policy via
- DIGNITY's Anti-Corruption Code of Conduct, which is appended to all collaboration contracts
- Regular inspection visits from DIGNITY's project manager and financial controller to the premises of collaborative partners in order to monitor the progress of projects and oversee internal safeguards and accounting capabilities.

If a collaborative partner is suspected of corruption, we will follow a range of the same procedural steps as those described above. The HR Manager's role is taken over by the Deputy Director and the relevant departmental manager, depending on which partner is involved. Thereafter, we will:

- Inform the Ministry of Foreign Affairs no later than 14 days after the suspicion has arisen. The notification can be either formal (using the correct form) or informal, depending on the situation
- Contact other relevant donors, if necessary
- Depending on what is required in the specific situation, set up a small follow-up group which basically includes the Deputy Director and the relevant departmental manager, project manager and controller
- Create a log in which all actions related to the following up of the suspicion are logged
- Include external audits, as required
- Include, within the frameworks of confidentiality, other relevant collaborative partners who have contact with partners against whom the suspicion is directed.

Instead of legal employment-related measures being taken, the collaborative relationship may be terminated followed by claims for compensation.

Insurance against loss by criminal actions

DIGNITY has taken out insurance to cover financial losses resulting from criminal acts committed by external parties, such as cybercrime, as well as by employees, such as embezzlement. The insurance is designed to counter potential major financial losses to DIGNITY due to criminal acts, losses that may have an impact on DIGNITY's overall finances.