



Anti-bribery and corruption position

Ørsted is committed to a zero-tolerance policy on bribery and corruption. Our commitment is detailed in our Good Business Conduct Policy and in our Code of Conduct for business partners. The purpose of this position is to describe our processes for identifying and managing bribery and corruption risks in our own operations.

Ørsted prohibits all forms of bribery, corruption, and kickbacks, given or received, whether directly or indirectly.

We have a Good Business Conduct Compliance Programme in place, which, based on regulatory guidance from e.g., the US Foreign Corrupt Practices Act and the UK Bribery Act, consists of the following elements: Top management commitment, clear governance processes, policies and procedures, risk assessment, training and communication, and monitoring and review.

Under our Good Business Conduct Compliance Programme, we have a Good Business Conduct Policy (applicable to our employees), a Code of Conduct (applicable to our business partners), and several underlying processes and procedures detailing our approach to Know-Your-Counterparty, Sponsorship & Donations and Gifts & Entertainment.

Our Good Business Conduct Policy has been adopted by Ørsted's Board of Directors and is overseen by Ørsted's Compliance Committee, which is chaired by Ørsted's CEO and consists of other senior executive members, including dedicated compliance officers within the different business areas.

Taking a risk-based approach, we assess our business partners by screening them and conducting further due diligence when needed on anti-bribery and corruption, sanctions, government watch lists, and adverse media to ensure compliance with our Good Business Conduct Policy.

This safeguards that our business partners comply with the requirements of our Code of Conduct.

The Code of Conduct forms part of our Good Business Compliance Programme, under which we assess the compliance risk both at group level and within selected areas on a regular basis, including an assessment of whether additional measures are required to mitigate unacceptable risk exposure.

Every year, we train our employees in our Good Business Conduct Policy to ensure the highest standards of integrity.

Anders Zoëga Hansen
Head of Group Legal