

Anti-Corruption and Fraud Policy

1. Purpose

Sikuki Nuuk Harbour A/S has zero tolerance for all forms of corruption – including bribery, facilitation payments, and other improper influence. Our company is built on values such as integrity, accountability, and transparency. Even the suspicion of corruption can damage our credibility and the reputation we actively work to maintain.

The purpose of this policy is to prevent corruption in all aspects of our business. It ensures that all employees are aware of their responsibilities, act ethically, and comply with applicable laws as well as international principles such as the UN Global Compact and the recommendations of Transparency International.

The policy applies to all employees, management, the board of directors, as well as external parties acting on behalf of or in cooperation with Sikuki.

2. The Policy

Financial Fraud and Deception

Sikuki Nuuk Harbour A/S has zero tolerance for any form of financial fraud, including embezzlement, accounting manipulation, forgery, and other fraudulent behavior that may cause financial or reputational damage to the company.

To reduce the risk of fraud, the following measures are implemented:

- At least once a year, a Fraud Check is carried out focusing on risks and internal control environments. Management may choose to have the annual Fraud Check conducted by an external auditor.
- Control measures are implemented in all financial processes, including approval procedures and segregation of duties.
- Ongoing risk assessment of potential fraud areas and subsequent adjustment of internal controls.
- Training and awareness among relevant employees to identify and handle irregularities.

Bribery and Facilitation Payments

Sikuki does not under any circumstances accept that anyone – whether employees, customers, suppliers, or other business partners – gives or receives money, gifts, or services with the purpose of gaining business advantages or influencing decisions. This also applies to kickbacks or facilitation payments.

Any attempt at bribery or improper influence must be reported immediately to management.

Gifts and Events

We safeguard independence and sound judgment in our business relationships. Gifts and invitations must therefore never be of a nature that could be perceived as influencing decisions.

- Only gifts of symbolic value may be given or received.
- As a rule, Sikuki covers all expenses for transportation, accommodation, and participation in business-related events.
- Exceptions require prior approval from management.

Conflicts of Interest, Nepotism, and Transactions with Related Parties

We recognize that Greenland is a society with close relations. To avoid any doubt about impartiality, all decisions must be based on objective, documented, and market-based criteria.

Personal relationships must never influence business decisions. Any conflicts of interest must be proactively identified and managed.

Charitable Contributions and Sponsorships

Sikuki supports local and community-beneficial initiatives, but all sponsorships and donations are awarded according to clear, transparent criteria as set out in our sponsorship policy.

We do not provide donations to political parties or individuals with political affiliations.

Fraud and Extortion

If an employee experiences or suspects fraud, extortion, or other unethical behavior, this must be reported immediately to management. We encourage employees to report even in cases of doubt – and no one will ever be criticized for exercising caution.

Violations and Whistleblower Scheme

Violations of this policy must be reported immediately to management. In addition, reports may be submitted anonymously through the company's whistleblower scheme.

Whistleblowers are fully protected against any form of retaliation, and all reports are treated with a high degree of confidentiality.

In cases of suspected financial fraud or deception, the same guidelines apply as for other breaches of this policy. All cases are handled confidentially, and relevant authorities are involved when necessary. As a general rule, Sikuki reports confirmed fraud to the police.

Review and Follow-up

This policy is reviewed at least once a year or in the event of significant changes in legislation, risk exposure, or company structure.

Version: September 2025

Responsible: JR / MNS

Approved by: Board of Directors

