

Anti-Bribery & Anti-Corruption Policy

Movinn A/S is committed to conducting business with integrity, transparency, and the highest ethical standards. Bribery, corruption, and unethical business practices undermine trust, distort fair competition, and expose Movinn A/S, its employees, and its partners to significant legal and reputational risk.

Movinn A/S maintains a zero-tolerance approach toward all forms of bribery and corruption. This policy applies to all employees, managers, directors, contractors, and business partners acting on behalf of Movinn A/S.

1. Purpose

Movinn A/S is committed to conducting business with integrity, transparency, and accountability. Corruption, bribery, fraud, and money laundering undermine fair competition, violate the law, and damage trust with employees, guests, suppliers, and society.

This policy establishes clear standards and procedures to prevent, detect, and respond to unethical or illegal conduct.

Movinn maintains a zero-tolerance approach to:

- Bribery and corruption
- Fraud and financial misconduct
- Money laundering
- Kickbacks or improper payments

This policy forms part of Movinn's overall Ethics and Governance framework.

2. Definition of Bribery and Corruption

Bribery refers to offering, giving, requesting, or receiving anything of value in order to improperly influence a business decision or secure an unfair advantage. Corruption includes any misuse of entrusted power for private gain, including facilitation payments, kickbacks, fraud, or improper conflicts of interest.

Movinn A/S strictly prohibits bribery in both the public and private sectors.

3. Scope

This policy applies to:

- All Movinn employees
- Management and executives
- Board members
- Contractors and consultants

- Suppliers and business partners acting on behalf of Movinn

Employees are expected to follow this policy in all professional interactions, including with:

- Guests and residents
 - Property owners
 - Suppliers and service providers
 - Public authorities
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3. Governance and Responsibilities

Movinn maintains clear governance structures to ensure effective implementation of ethical standards.

The CEO holds ultimate responsibility for ethical governance and compliance with this policy.

Ethics Officer

The CEO serves as Ethics Officer and oversees:

- Ethical compliance
- Investigation of misconduct
- Implementation of corrective actions

Board Oversight

Independent oversight is provided by:

Christian Jakobsen
Member of the Board (MOTB)

The Board ensures that ethical policies are implemented effectively and reviewed regularly.

4. Ethical Principles

Movinn employees must:

- Act honestly and transparently
- Avoid conflicts of interest
- Reject any form of bribery or corruption
- Protect company assets and resources
- Comply with applicable laws and regulations

Employees must never exploit their position for personal gain.

5. Third Parties and Suppliers

Movinn A/S expects suppliers, contractors, and service providers to uphold equivalent standards of integrity. Movinn reserves the right to terminate business relationships in cases of confirmed bribery, corruption, or unethical conduct.

All key suppliers are encouraged to comply with Movinn's Supplier Code of Conduct.

6. Prohibited Conduct

Employees and representatives of Movinn A/S must never:

- Offer, promise, or provide bribes, kickbacks, or improper payments
 - Accept gifts, hospitality, or benefits that could influence (or appear to influence) decision-making
 - Make facilitation payments to speed up administrative processes
 - Engage in fraudulent behavior, embezzlement, or unethical financial practices
 - Use intermediaries or third parties to conduct prohibited activities on Movinn's behalf
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7. Anti-Bribery and Corruption

Movinn strictly prohibits bribery in any form.

Bribery includes offering, giving, receiving, or requesting anything of value to improperly influence a business decision.

Examples include:

- Cash payments
- Gifts intended to influence decisions
- Travel or hospitality offered to secure contracts
- Kickbacks or hidden commissions

Employees must never offer or accept benefits intended to improperly influence business outcomes.

8. Fraud Prevention

Fraud is any intentional deception for financial or personal gain.

Examples include:

- Falsifying financial records
- Misuse of company funds
- Expense fraud
- False reporting of operational data
- Manipulation of invoices or procurement processes

Employees must report any suspected fraudulent activity immediately.

9. Anti-Money Laundering

Movinn does not participate in or facilitate money laundering.

Money laundering refers to concealing the origin of illegally obtained funds through legitimate business activities.

Employees must remain alert to suspicious transactions, including:

- Unusual payment structures
- Requests for large cash payments
- Payments from unrelated third parties
- Attempts to conceal the true identity of counterparties

Any suspicious financial activity must be reported to management immediately.

10. Conflicts of Interest

Employees must avoid situations where personal interests may conflict with Movinn's business interests.

Potential conflicts include:

- Financial interests in suppliers
- Family relationships with contractors
- Personal benefits linked to business decisions

Employees must disclose potential conflicts to management.

11. Gifts and Hospitality

Small and reasonable hospitality may be acceptable when it supports legitimate business relationships.

However:

Employees must never accept or offer gifts or hospitality that:

- Influence business decisions
- Exceed reasonable value (max level to the equivalent to 700 DKK, which is the tax-free bracket in DK)
- Could create a perception of impropriety

When in doubt, employees must seek guidance from management.

12. Ethical Red Flags

Employees should be alert to potential corruption risks.

Examples of red flags include:

- Requests for cash payments
- Unusual payment instructions
- Pressure to bypass procurement procedures
- Requests to falsify documentation
- Unusually generous gifts or entertainment
- Lack of transparency in supplier relationships

If any red flags arise, employees must report them immediately.

13. Reporting Concerns

Movinn provides a confidential reporting channel for ethical concerns.

Reports can be submitted to:

whistleblower@movinn.dk

Access to reports is restricted to:

- CEO, Patrick Blok
- Board Member Christian Jakobsen

Movinn strictly prohibits retaliation against individuals who report concerns in good faith.

14. Monitoring and Targets

Movinn monitors ethical performance through the following indicators:

- 100% employee acknowledgment of Ethics Policy
- 100% supplier adherence to Supplier Code of Conduct
- Annual ethics training for employees
- Zero confirmed incidents of corruption or bribery

Ethics compliance is reviewed annually as part of Movinn's ESG governance process.

15. Disciplinary Measures

Violations of this policy may result in disciplinary action.

Depending on severity, consequences may include:

- Formal warning
- Mandatory training
- Termination of employment

- Termination of supplier contracts
- Legal reporting where required

Movinn treats all violations seriously and investigates allegations fairly.

16. Policy Acknowledgment

All employees must acknowledge and comply with this policy.

Acknowledgment includes:

- Reading the policy
- Confirming understanding of ethical obligations
- Signing an employee declaration where required

New employees receive this policy during onboarding.

17. Review and Revision

This policy is reviewed periodically to ensure alignment with regulatory requirements and best practices.

Revision History

Version	Date	Description	Approved by
1.0	1 February 2023	Initial version (Impact Policy 2022)	CEO Patrick Blok
2.0	1 February 2026	Detailed policy update	CEO Patrick Blok

18. Enforcement

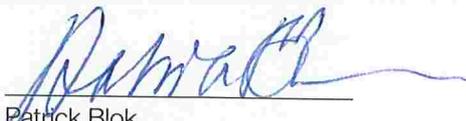
Violations of this policy may result in disciplinary action, termination of employment or contracts, and possible legal action.

Approved by,

Date:

1 February 2026

Signature:



Patrick Blok
CEO Movinn A/S