



GreenMobility's Anti-Corruption Policy

November 2020





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Introduction and Purpose

Ensuring a high business integrity is at the heart of GreenMobility. This policy is made to emphasize GreenMobility's zero tolerance approach to corruption in any of its shapes. With this policy, we will do our utmost to inhibit and oppose corrupt behavior. If GreenMobility is suspected of unethical behavior, it hurts all of us, and so it is of common interest to adhere to all applicable laws.

At GreenMobility, we strive to comply with the 10th principle of the UN Global Compact based on the UN Convention against corruption and adhere to all applicable laws in the countries we operate in.

The purpose of this policy is to define GreenMobility's anti-corruption and bribery policy to which all our employees, contractual employees and suppliers must adhere to and respect. The purpose is to ensure that we act professionally, ethically, transparent and with the highest level of business integrity as possible.

We commit to doing an annual due diligence internally, to identify, prevent, mitigate any potential blind spots and areas of improvement, and publicize our findings.

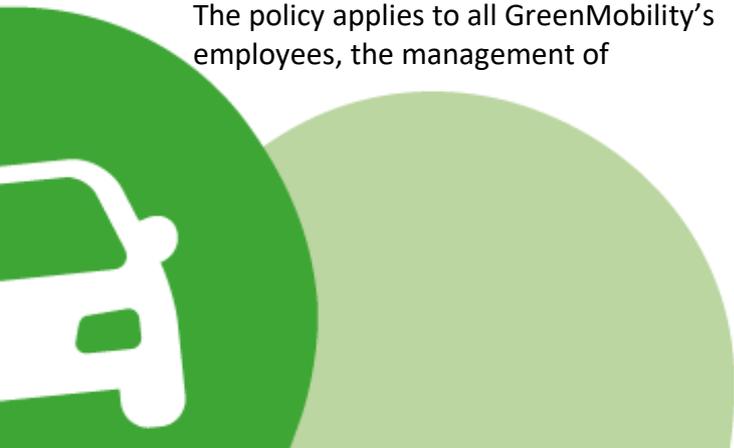
The policy applies to all GreenMobility's employees, the management of

Scope of the Policy

GreenMobility, contractual employees, and its subsidiaries. Furthermore, GreenMobility expects that all our business partners, third party representatives, and suppliers are adhering to and respecting our policy as well.

If you are ever in doubt as an employee about how to act in a given situation, it is important that you confer with your immediate manager about how to proceed.

The policy is adopted by GreenMobility's executive management and is hereafter owned and updated by the Investor Relations Team and all concerns related to this policy has to be sent to GreenMobility's Head of ESG. In case you experience a situation that violates this policy, we recommend that you express it, either by contacting the Head of ESG, or the Chairman of the Board of Directors.





Definitions

What is corruption?

Any unlawful or improper behavior that seeks to gain an advantage through illegitimate means. Corruption can take many shapes and is explained in Section 3: "Shapes of Corruption".

What is a gift?

A gift is of any value, any shape, any size. A present is given or received without a direct return or contractual commitment. It can take the shape of a thing, tickets, travels, gift cards, restaurant visits, or the like.

Acceptable gifts:

- Occasional, modest gifts, commercial articles, chocolate, flowers for Christmas and jubilees.
- Occasional dinners with business connections tied closely together with business-related work
- Tickets for arrangements, cinema, and the like, where the gift-giver is also present

Unacceptable gifts:

- Gifts or advantages, which is deemed to change the objectivity in decision-making related to the gift giver
- Gifts where there is an expectation of getting something in return (a quid pro quo)
- Personal favors or grants
- All forms of favors of unethical character
- Loans
- Expensive things like a smartphone, jewelry, weekend retreat or other luxurious things.
- Travels offered that is not tied to a business-related content.

The abovementioned activities can be accepted under certain circumstances:

- If your manager accepts it *and*
- The travel has an unequivocal professional content *and/or*
- The collective value of the expense is not in deep contrast with the professional purpose.



Requirements

1. Business Integrity

1.1 It is expected that anyone acting in GreenMobility's name take responsibility and act with integrity in all business transactions and obey this policy.

2. Hospitality, gifts, and donations

2.1 You are always allowed to accept an invitation from current and future partnerships, including dinners, cultural or sport events, receptions, or the like, which is viewed as a legitimate way to strengthen business connections. However, if such events are not within a professional scope where the connection or partner is not participating, or if the arrangement is not of a modest character, or expected to be paid back, you kindly must reject the invitation. In sum, there must be a clear business-reason for attending.

2.2 The transaction of gifts between employees of GreenMobility A/S, our customers, suppliers, and other partners, both current and potential, is a way of expressing gratitude for the collaboration. However, the more valuable and frequent a transaction occurs, the more inappropriate the behavior becomes - and the more you need to be alert.

2.3 Travel and accommodation should always be paid by GreenMobility A/S unless it is cleared with your manager.

2.3.1 The total cost of the travel and accommodation should be within a reasonable amount.

2.3.2 Travels and payment for accommodation for the party invited can only be made under certain circumstances, this must be aligned with your manager.

2.4 Please confer with the definition of an acceptable or unacceptable gift in case you are in doubt about whether it is an appropriate to accept the gift.

2.4.1 If you are in a situation where you cannot deny the present, you must inform the management of GreenMobility A/S as soon as possible, who are then responsible of managing the situation lawfully.

2.5 In any given situation, always keep an eye out for red flags. Red flags are signals where you need to apply specific precaution before proceeding.

3. Shapes of corruption

3.1 Facilitation payments are illegal. Facilitation payments are characterized as bribe and can be defined as unofficial fees.

3.1.1 You avoid facilitation payments by asking for a receipt of the transaction, perhaps explaining the company policy. Prior to your travel, check if the destination country has ratified the UN Convention of Corruption. If so, facilitation payments are illegal.

3.1.2 If you evaluate that a given situation is dangerous for your own well-being



3.2 Bribery is illegal. Bribery is offering, giving, soliciting, or receiving an item of value, which is meant to influence the action of an individual holding a public or legal duty.

3.3 Trading in influence or influence peddling is illegal. Trading in influence is defined as the illegal practice of using one's authority to obtain favors and preferential treatment for another, usually in return of payment.

3.4 Nepotism is illegal. Nepotism is defined as favoring friends, relatives, especially when securing them employment. You cannot hire family members, friends or acquaintances, or change any work conditions in a way which could place them in a favorable position without your manager's consent.

3.5 Extortion is illegal. Extortion is defined as the act of obtaining something using force, threats or blackmailing.

3.6 Patronage is illegal. Patronage is using one's authoritative power to favor or control the appointments within the office or the right to privileges.

3.7 Kickbacks are illegal. A kickback is related to the secret or illicit payment in exchange for an improper service or preferential treatment.

4. The use of intermediaries and lobbyists

4.1 Always do a proper background check of the intermediary or external lobbyist before signing a contract in order to avoid any adverse selection.

4.2 Make sure that all agreements between you and the external party is in writing.

5. Corruption and Social investments

5.1 Always be cautious if you are offered to invest in a Social Investment. Inquire what the interests of those offerings are and whether your contribution would affect the outcome of the public officials' choice of supplier.

6. Conflict of interests and insider information

6.1 As an employee of GreenMobility A/S, you cannot be engaged in any direct or indirect activities which could create doubt about your judgment or the objectivity of your work. Your decisions should be made based on what serves the interest of GreenMobility A/S, and not what advantages or disadvantages it will create for you personally.

6.2 Use your common sense and judgment and if in doubt, confer with your immediate manager.

6.3 Making use of knowledge or managerial power received in GreenMobility A/S to gain direct or indirect profit creates a conflict of interest and must be refrained from.

6.4 Insider information creates a clear conflict of interest. If you experience anything that could be characterized as insider information, please do not hesitate to contact your immediate manager.



6.4.1 Insider trading is a strong violation against the UN's convention on corruption, as well as national criminal law.

7. Be aware of and be critical

7.1 If you experience behavior from colleagues or business partners that you deem to be against the Anti- Corruption Policy, you are obliged to report this to your immediate manager, management and Board of Directors.

7.2 In such an event, you are not expected to be able to present evidence or documentation, but you must be able to describe the reason and the foundation of your concerns.

7.3 No employee should fear reprisals as a consequence of the information provided to management. There will be no negative consequences related to the terms and conditions of your employment.

8. Violation of the policy

8.1 GreenMobility expects management to take the necessary steps in case violations are being reported or surface, which potentially could lead to a dismissal of the employee.

Roles and responsibilities

Roles	Responsibilities
Head of ESG	In charge of updating the Anti-Corruption Policy
Head of ESG	In charge of ensuring and endorsing the implementation of the Policy
Head of ESG	Is the 'Policy owner'
Management	In charge of implementing the policy in their respective teams
Board of Directors	In charge of advising the policy owner
Management	Responsible for policy approval
GreenMobility's management, employees, and contract workers	Responsible for adhering to the policy



Deviations

This policy can be granted no exemptions unless a case occurs under exceptional circumstances, or the policy is assessed not be applicable. All requests for exemptions must be made in writing to the policy owner, i.e. The Head of ESG. The policy owner must assess and decide on each request individually. Exemptions must be logged and documented.

Policy Revision

This policy must be regularly reviewed to ensure its continued adequacy and relevance. In the event of any discrepancies between the English version of this policy and a translated version, the English version will be binding.

Associated Policies and Manuals

- Diversity and Inclusion Policy
- Human & Labor Rights Policy

Contact

For more information, please contact the Head of ESG.