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Anti-corruption and Bribery Policy

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1. Policy statement:

JYSK takes a zero-tolerance approach to bribery and corruption. This policy sets out our global commitment to act with integrity and transparency in all our business dealings, and to comply with international anti-bribery standards, in particular the UK Bribery Act 2010 and the United Nations Convention Against Corruption (UNCAC). Further, this policy reflects our commitment to uphold all laws relevant to countering bribery and corruption.

We prohibit the offering, giving, solicitation, or receiving of any bribe, whether directly or indirectly, and expect the same from our partners and suppliers.

The policy is based on the following international standards and legislation:

- UK Bribery Act 2010
- Corporate Criminal Offence (UK Criminal Finances Act 2017)
- United Nations Convention Against Corruption (UNCAC)
- All relevant national laws in our countries of operation

2. Scope:

This policy applies globally to all JYSK employees, board members, temporary workers, consultants, contractors, and third parties acting on behalf of JYSK, including consultants, agents, suppliers, and contractors.

As JYSK takes a risk-based approach to its anti-bribery and corruption efforts, particular attention is given to functions and roles considered at higher risk of exposure to bribery, including but not limited to:

- Country Directors (CD)
- Financial Managers (FIM)
- Expansion and Real Estate Managers (DVM)
- Logistics Director (LD)
- Transport Managers
- Purchasing and Sourcing staff
- Customs brokers and freight/logistics partners
- Store lease negotiators and refurbishment contractors
- Legal, Audit, and Compliance roles involved in third-party agreements

This policy is made available to all employees through our intranet and all relevant JYSK employees are introduced to this policy during their onboarding. All functions at high risk of corruption and bribery are required to undergo yearly training in JYSK's Anti-bribery and Corruption Policy. The zero-tolerance approach to bribery will be communicated to suppliers and contractors at the outset of our business relationships and is managed through the yearly risk assessment thereafter.

3. Objectives:

The objective of this policy is to promote JYSK's zero-tolerance approach to bribery and corruption and reflects our objective to never engage in any form of bribery or corruption.

4. Actions, strategies, processes:

JYSK pursues a zero-tolerance policy and prohibits all forms of bribery and corruption. Specifically, it is strictly forbidden to:

- Offer, promise, or give bribes of any kind
- Accept or request any form of bribe or undue benefit
- Make facilitation payments (even if locally tolerated)
- Use intermediaries to conceal corrupt behaviour
- Provide unfair advantages based on family, friendship, or personal relationships
- Misuse company resources, when intentionally concealing, altering, falsifying, or omitting information for own benefit or the benefit of others
- Concluding unlawful anti-competitive agreements as well as exchanging unlawful price and/or market information with competitors

Due diligence

To uphold our zero-tolerance approach to bribery, JYSK has implemented several key actions and controls:

- A background investigation is conducted for people and organisations acting on behalf of JYSK, or for new suppliers where the risk of bribery is medium to high (see functions at risk under 2. Scope and risk assessment criteria below).
 - The background investigation is performed via the tool Member check and scans people or organisations for former sanctions, financial crimes, corruption or bribery convictions, modern slavery etc.
- A yearly risk assessment is performed of all countries where JYSK operates or where its suppliers are located based on Corruption Perception Index from Transparency International:

- A score up to 40 is considered to be high risk countries
- A score between 41 and 50 is considered to be medium risk
- Score above 50 is considered to be low risk
- The Anti-bribery policy is included in the introduction plan for CD, FIM, DVM and Transport Manager
- A whistleblower service is publicly available (see 6. Compliance and grievance mechanisms).

Training and awareness

This policy is made available to all JYSK employees at MYJYSKdocs and any relevant updates will be communicated to employees continuously.

The at-risk functions are trained and updated at a regular frequency, depending on their functions:

- The Executive Management Team is trained in anti-corruption and bribery on a yearly basis.
- CD meeting on a yearly basis
- FIM meeting on a yearly basis
- LD meeting on a yearly basis
- Finance Operations is responsible for communicating to EMT, CD, LD and FIM. FIM are responsible for communicating internally in their own organisation to high-risk positions.

5. Governance

Role	Responsible	Responsibility
Policy owner	EVP Finance & CFO	Provides strategic oversight and ensures alignment with corporate goals. Most senior level responsible for the implementation of the policy in JYSK.
Policy approver	Sustainability Management Group	Reviews and approves policies, ensuring consistency and compliance on policy form.
Policy responsible	Finance Operations	Drafts and revises policies.
Policy implementation	Finance Operations	Ensures the policy is enforced throughout the value chain.

All JYSK employees are expected to adhere to this policy, participate in training as required, and report any misconduct.

6. Compliance and grievance mechanisms

Monitoring is carried out through desk research and on-site controls by Finance Operations. Bribery concerns can be reported anonymously via the whistleblower service at [Whistleblower Service | JYSK](#). Indications or accusations of bribery are investigated by Finance Operations and communicated to top management. Any improvements identified will be implemented, and internal controls will be subject to regular audits to ensure they remain effective in countering bribery.

All reports are handled confidentially and in accordance with EU Whistleblower Protection Directive (Directive (EU) 2019/1937).

Confirmed incidents of bribery or corruption will result in immediate termination of employment and will be reported to the relevant authorities.

7. Reporting and transparency

Progress on policy implementation and incident trends will be summarised annually in the Sustainability Statement.

Performance and compliance of this policy and updates will be shared with executive leadership as relevant through the Sustainability Management Group.

8. Related policies

This policy should be read in conjunction with other internal or external policies that concern anti-corruption and bribery, which includes:

- Policy for receiving gifts, samples etc.
- Supplier Policy
- Supplier Code of Conduct

Approval and updates:

This policy has been approved by JYSK's Sustainability Management Group and is valid from September 2025. This policy is as a minimum updated bi-annually and adjustments will be made based on our performance, technological advances and the development of best practices.

Appendix: Definitions:

Term	Definition
Bribery	Offering, giving, receiving or soliciting an item or service of value to influence a decision.
Corruption	The abuse of entrusted power for private gain. This includes bribery, embezzlement, nepotism, favouritism, and conflicts of interest.
Corporate Criminal Offence (CCO)	An offence under the UK Criminal Finances Act 2017 where a company is held liable if it fails to prevent someone associated with it (e.g. employee or agent) from facilitating tax evasion. This Anti-Corruption Policy forms part of JYSK's procedures to prevent the facilitation of tax evasion and to comply with the CCO requirements.
Facilitation payments	Small, unofficial payments made to expedite routine government actions (e.g. customs clearance). These are illegal under JYSK's policy, even if commonly practiced in some regions.
Third-party	Any individual or entity not employed by JYSK, but acting on behalf of, or in partnership with, JYSK. This includes agents, consultants, contractors, suppliers, and intermediaries.
UK Bribery Act 2010	A UK law that prohibits giving or receiving bribes, bribing foreign officials, and corporate failure to prevent bribery. It applies globally to companies with UK ties. This policy is designed to meet the expectations of the Bribery Act.
Zero-tolerance	JYSK's principle of strict prohibition of bribery under any circumstances.