

Version	Page	Date	Procedure	Approval by
1.1 2018R1	1	22/01/2018	PJDE ANTI CORRUPTION POLICY	MIE

ANTI CORRUPTION POLICY

This Anti-Corruption Policy for PJ Diesel Engineering A/S and Representatives prohibits corruption of all officials (clients, vendors, partners, all PJ Diesel Engineering A/S business relations), which means paying money or giving something of value to an official to obtain an improper benefit. This Policy similarly prohibits the payment of bribes or kickbacks in commercial transactions that do not involve officials. Corruption is prohibited by the laws in almost every jurisdiction of the world.

This Policy also prohibits money laundering, which is the process of concealing funds that have been illegally obtained.

PJ Diesel Engineering A/S, and all of its subsidiaries and joint ventures worldwide, requires its channel partners (for example, resellers, advisors, original equipment manufacturers, and distributors), consultants, lobbyists, and other third-party representatives (collectively, "PJ Diesel Representatives") to comply with this Policy. PJ Diesel Engineering A/S and Representatives acting on behalf of PJ Diesel Engineering A/S can expose PJ Diesel to liability under anti-corruption and anti-money-laundering laws, including the United States Foreign Corrupt Practices Act ("FCPA"). Further, corruption promotes poverty, hunger, disease, and crime, and it keeps societies and individuals from reaching their full potential. Corruption is one of the leading obstacles to economic and social development. PJ Diesel is committed to observing the standards of conduct set forth in the FCPA and the anti-corruption and anti-money-laundering laws of the countries/regions in which it operates. PJ Diesel is also committed to taking reasonable steps to ensure that PJ Diesel and Representatives comply with these standards of conduct and laws in its dealings with or on behalf of PJ Diesel Engineering A/S.

Compliance with Anti-Corruption Laws

Each PJ Diesel Engineering A/S and Representative will comply with all applicable anti-corruption laws, including the FCPA. No PJ Diesel or Representative shall, directly or indirectly, offer or pay anything of value (including gifts, travel, entertainment expenses, and charitable donations) to any official or employee of any government, government agency, political party, or public international organization, or any candidate for political office, to (i) improperly influence any act or decision of such official, employee, or candidate for the purpose of promoting the business interests of PJ Diesel Engineering A/S in any respect, or (ii) otherwise improperly promote the business interests of PJ Diesel Engineering A/S in any respect.

Version	Page	Date	Procedure	Approval by
1.1 2018R1	2	22/01/2018	PJDE ANTI CORRUPTION POLICY	MIE

Vetting of PJ Diesel Engineering A/S and Representatives

PJ Diesel Engineering A/S will conduct a due diligence or “vetting” of each PJ Diesel and Representative to determine that its relationship with the representative does not pose a risk to PJ Diesel of noncompliance with this Policy. As part of this process, PJ Diesel will ask the PJ Diesel and Representatives to respond to a questionnaire and, if appropriate, provide additional information that may be necessary in the reasonable judgment of PJ Diesel. PJ Diesel appreciates the understanding and cooperation of each PJ Diesel and Representative in this regard.

Anti–Money Laundering

No PJ Diesel Engineering A/S and Representative shall use its relationship with PJ Diesel Engineering A/S to attempt to disguise the sources of illegally obtained funds.

No Retaliation

PJ Diesel Engineering A/S and Representatives will not retaliate against anyone who has, in good faith, reported a possible violation of this Policy, or refused to participate in activities that violate this Policy.

Enforcement

PJ Diesel Engineering A/S will enforce this Policy in accordance with the terms of its contracts with PJ Diesel Engineering A/S and Representatives.

Name of company:	PJ Diesel Engineering A/S
Authorized Signatory:	Anne-Mette Elsborg, Group CEO
Place (where signed):	Copenhagen, Denmark
Pages	2/2