

SDU's policy for conduct, anti-corruption and for protection from sexual exploitation, abuse, and harassment (PSEAH)

Introduction

The University of Southern Denmark (hereinafter referred to as SDU) is committed to maintaining the highest standards of integrity, transparency, and accountability. Every day, we unite to achieve this goal, and whether we are collaborating internally or with external partners, we are committed to uphold our ethical responsibilities.

This policy outlines the principles and expectations that guide the behavior of all employees, contractors, and representatives of our institution. Compliance with this policy is mandatory to ensure a professional and respectful environment for all parties involved.

We believe it is our responsibility to respect and uphold the human rights of our employees and all individuals we interact with, directly or indirectly. We strive to prevent any involvement in human rights abuses, including but not limited to sexual exploitation, abuse and harassment. We adhere to applicable labor and employment laws and follow internationally recognized labor principles in our operations. Our approach to human rights is seamlessly integrated into our existing practices, including Human Capital, Procurement, Ethics & Compliance, and Corporate Responsibility activities.

This Statement applies to everyone within our organization.

When we use terms like "we," "our," or "us," we are referring to all employees, individual partners, and staff, as well as the member firms that collectively form SDU. We also encourage our suppliers, including non-staff working for or representing us on our premises and client sites, to respect and adhere to this Statement where appropriate. This policy outlines shared expectations for our behavior. A fundamental aspect is our adherence to relevant laws and regulations. Where local laws or regulations impose stricter requirements than those in this policy, we comply with the local laws or regulations. Additionally, network and local policies, along with supplementary guidance, support the principles outlined in this policy.

Our core values

SDUs purpose is to provide high-quality education and conduct research that contributes to society. Its mission includes fostering critical thinking, innovation, and collaboration across disciplines to address global challenges.

Specifically, the following core values serve achieving our purpose:

Integrity: We act with honesty and adhere to the highest ethical standards.

Respect: We treat everyone with dignity and consideration.

Transparency: We conduct our activities openly and are accountable to the public.

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Professionalism: We strive for excellence in our work and conduct.

Inclusivity: We promote diversity and equal opportunity for all.

We serve clients whom we are competent to assist, who value our services, and who uphold appropriate standards of legitimacy and integrity. We only offer services that we are professionally capable of delivering, collaborating to bring necessary skills and innovation to our work, and ensuring we fulfill our commitments.

Our reputation is built on trust, integrity, and consistently delivering high-quality, sustainable value. Sustaining our success requires adhering to professional standards, complying with relevant laws and regulations, and meeting ethical obligations while delivering innovative and high-quality work.

Integrity guides all our actions, including independently completing training, assessments, and examinations. Our business judgments are objective, free from bias, conflicts of interest, or undue influence. We follow rigorous processes and procedures to identify and address any actual or potential conflicts of interest or sensitive situations. Recognizing that independence—both in reality and perception—is crucial to objectivity, we proactively identify, evaluate, and manage interests and relationships that could create threats to our independence when providing assurance services. We adhere diligently to applicable independence rules, standards, and policies.

We are prepared to disengage from engagements and clients if continuing would risk compromising our professionalism, integrity, or objectivity—including independence. We uphold our integrity by lawfully and ethically negotiating and securing contracts with our clients, suppliers, and other parties.

Regulation and standards

Wherever we operate, we will comply with local laws and regulations and cooperate with relevant authorities to respect and promote internationally recognized human rights.

If local legislation is more stringent than our policy, local requirements will apply in addition to our policy. If local legislation conflicts with our policy commitments, we will comply with the law but also seek to raise awareness of human rights within our spheres of influence and if local legislation is less stringent than our policy, we will adhere to the commitments set out in our policy.

In addition to local legislation, we recognize certain international human rights standards and seek to act in accordance with internationally declared human rights and standards, including those expressed in the International Bill of Human Rights and the principles concerning fundamental rights outlined in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Policy

We specifically commit to the following:

Our employees:

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We are committed to investing in our employees by providing development opportunities and encouraging continual learning. We will promote a workplace culture that fosters flexibility and a healthy work/life balance. We uphold a strict policy of anti-harassment, anti-abuse and anti-sexual exploitation and non-discrimination, ensuring a respectful and inclusive working environment. Our commitment to fair compensation includes providing fair wages and benefits. We recognize the right of our employees to form and join associations freely. We prioritize the health and safety of our employees at work, actively promoting their well-being and providing a secure working environment.

We have a zero-tolerance policy for forced, bonded, or involuntary labor and will not tolerate any instances of child labor.

Our suppliers:

If we identify any concerns that the products or services provided to us may be directly linked to human rights violations, we will take proactive steps to address these issues. Our approach involves using our comprehensive policy to clearly communicate our expectations to the relevant suppliers, whether they are existing partners or potential suppliers under consideration. We will engage in open dialogue with these suppliers to ensure they understand our standards and work collaboratively with them to develop and implement strategies to mitigate any adverse impacts.

This collaborative effort may include conducting thorough assessments of the suppliers' practices, providing guidance on improving their human rights policies, and monitoring their progress to ensure compliance with our standards. Our commitment extends beyond mere compliance; we aim to foster long-term partnerships with suppliers who share our values and dedication to upholding human rights. By doing so, we contribute to the broader goal of promoting ethical practices throughout our supply chain and reinforcing our commitment to social responsibility.

Our clients:

If we identify concerns that our work may be directly linked to human rights violations by a client, we will take immediate and deliberate action. Our first step is to engage in thorough discussions with all relevant parties to fully understand the scope and nature of these concerns. Through these discussions, we aim to identify the potential impacts and explore ways to mitigate any adverse effects. We are committed to only proceeding with our work if we are fully confident that it will not contribute to human rights violations. This approach ensures that we uphold our ethical standards while working towards solutions that respect and protect human rights.

Integrity is a core value that we are unwavering in maintaining. We are prepared to disengage from clients and projects where our integrity could be compromised. This means that if, after thorough consideration, we determine that continuing our work would put our ethical principles at risk or associate us with practices that contradict our commitment to human rights, we will not hesitate to step away. Our dedication to integrity ensures that we remain a trustworthy and principled institution, prioritizing ethical conduct over potential business gains. In conclusion, our approach to client relations is governed by a steadfast commitment to human rights and integrity. We actively address and mitigate any concerns related to human rights violations, ensuring that our work does not contribute to such issues. Furthermore, we are prepared to disengage from any client or project that poses a risk to our ethical standards, reinforcing our commitment to operating with the highest

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level of integrity. Through these measures, we aim to build and maintain trust, both within our institution and with the broader community we serve.

Governance

All employees and partners are required to adhere to this Statement.

We will actively communicate this Statement to our employees and use it as a foundation for engaging with both internal and external parties, including suppliers and clients, on human rights issues as appropriate.

We identify and manage conflicts of interest transparently and ethically. Personal interests must not interfere with our duties and obligations to the institution. We maintain professionalism in our interactions and decision-making processes. Each member of our institution is accountable for their actions and responsibilities.

Bribery

We do not engage in bribery or corrupt practices, whether directly or indirectly through third parties. This principle is crucial for maintaining the trust of our colleagues, clients, and partners. We also avoid actions that could create the perception of bribery or corruption. We do not solicit, accept, offer, promise, or pay bribes, including facilitation payments. We ensure we know the identity of our clients and business partners and understand the nature of their business activities. We adhere to applicable anti-money laundering standards and take appropriate action when suspicious or criminal behavior is observed and reported. We do not conduct activities that breach applicable economic sanctions or assist clients in violating sanctions laws.

We fulfill our tax obligations diligently. We handle all our pertinent tax filings, both domestic and international, accurately, in good faith, and punctually. As conscientious tax advisors, we navigate the complexities of global business and the diverse priorities of national laws, striving to define clear boundaries where necessary.

Human rights

We prioritize, respect, and uphold internationally recognized human rights principles. We actively work to prevent any involvement in human rights abuses, including but not limited to sexual exploitation, abuse and harassment. Our operations adhere to applicable labor and employment laws, guided by globally recognized labor standards.

Our organization maintains a steadfast commitment to eradicating all forms of slavery, sexual exploitation, harassment and human trafficking. We uphold this commitment across our entire operations and supply chain, ensuring that our practices and those of our partners align with the

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highest ethical standards. We actively monitor and assess our operations to prevent any involvement in slavery or human trafficking, complying rigorously with international laws and standards. Through continuous education, awareness, and responsible sourcing practices, we aim to contribute positively to the global fight against these egregious violations of human rights.

Inclusivity and diversity

We embrace diversity and inclusion, recognizing the unique strengths of our workforce as a competitive advantage that we actively foster and enhance. We cultivate a culture that prioritizes innovation, professional growth, career development, workplace flexibility, and work-life balance.

We invest in the continuous learning and career advancement of our employees, providing opportunities for both immediate growth and long-term progression. Our commitment to ongoing learning and open-mindedness is fundamental to our ability to innovate and tackle significant challenges. Our purpose defines our existence, our strategy channels our focus, and our values shape our actions. We believe that our differences enhance our ability to innovate, solve problems, and connect with our clients and communities. This policy outlines our expectations for behavior to ensure a welcoming and inclusive atmosphere for everyone.

Confidentiality and privacy

We respect the privacy and confidentiality of information belonging to our clients, employees, and business partners. We protect personal and other confidential information in all forms. We handle the collection, storage, use, transmission, and disposal of personal and confidential information in a transparent manner that promotes trust and complies with the laws and regulations of the countries in which we operate. We gather, use, and retain personal, client, and other confidential information only for legitimate reasons, and access to this information is strictly controlled.

Our duty of confidentiality extends beyond our tenure at SDU; we continue to respect the confidentiality of information even after leaving the institution. Everyone has a role in protecting the confidential information entrusted to us. We follow these principles:

Approved Systems: We only use approved systems and applications in our work.

No Inappropriate Disclosure: We do not inappropriately divulge confidential information, including on social media.

Caution in Public Spaces: We are cautious when discussing client matters in public spaces.

Physical Protection: We take care to protect physical copies of confidential information.

Prompt Reporting: We promptly identify any unintended disclosure of confidential information and escalate the issue as appropriate within the institution.

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We assess the appropriateness of technology and use it responsibly to ensure the protection of confidential information.

We safeguard the information and physical and electronic assets entrusted to us, protecting them from malicious threats and accidental loss. We ensure the security of all paper and electronic records and retain them only for the prescribed period and preserve relevant information when we anticipate or are aware of an investigation, litigation, or other matters, or when instructed to do so. We maintain the integrity of our work papers and avoid making inappropriate changes once they are complete. Additionally, we never trade on or inappropriately disclose inside information. We communicate thoughtfully both online and offline. We maintain courtesy and respect when speaking in public or online forums, using social media, or participating in external discussions. When expressing opinions on community or public issues, we clarify that these views are our own and not necessarily those of SDU. In situations where the audience might reasonably expect us to represent SDU, we typically express only the institution's views and not our own personal opinions. We also avoid presenting others' views as our own. Additionally, we comply with copyright and intellectual property laws.

Social media and other platforms

Engaging with others through social media has become an integral aspect of modern life. However, we are aware that the boundary between personal and professional social media use can easily blur. What we communicate or share on social media, whether in a personal or professional capacity, can have significant impacts on our clients, our organization, our colleagues, and ourselves. Aligned with our commitment to fostering trust, we carefully consider what we post, both personally and professionally. This mindful approach ensures that we uphold SDU's objectivity and professional integrity, minimizing any potential risks. We maintain respect for our audience and colleagues in our social media interactions and prioritize the privacy of our colleagues and clients.

Our conduct on social media platforms reflects our in-person professionalism because we understand that maintaining professionalism is equally crucial online and offline.

Compliance with the policy

All members of SDU including employees, volunteers, contractors, and representatives, are expected to adhere to this policy. Violations may result in disciplinary action, up to and including termination or legal consequences, depending on the severity and impact of the breach.

Continuous improvement

We continuously review and improve our practices to ensure they align with our values and meet evolving societal expectations.