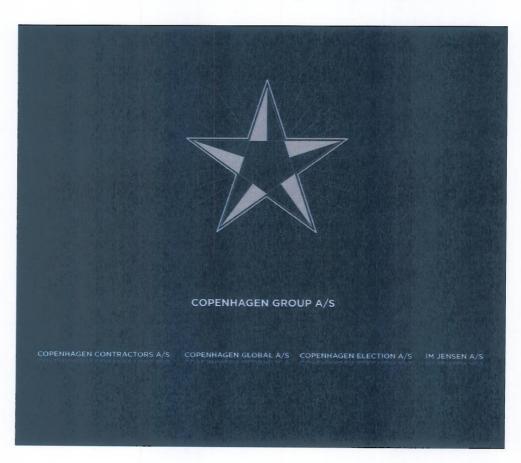


Copenhagen Group A/S, Denmark Communication on Progress (COP) 2012





General

Period covered by your Communication on Progress (COP)

From: January 2011 To: March 2012

Introduction

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations

Statement of continued support for the UN Global Compact by the Chief Executive Officer (CEO)

I am pleased to confirm that Copenhagen Group A/S and its subsidiaries, Copenhagen Contractors A/S, Copenhagen Global A/S (also including IM Jensen Worldwide in Afghanistan) and Copenhagen Elections A/S reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

This statement is formed as an introduction to the 2012 Communication on Progress report, where Copenhagen Group will show areas of development, implementation and measurement of the Global Compact principles and outcomes.

This statement is further intended to inform all stakeholders of our continued support and value for the ten principles;

Human Rights

Copenhagen Group will:

- Principle 1: Support and respect the protection of internationally proclaimed human rights;
- Principle 2: Make sure that we are not complicit in human rights abuses.

Labour Standards

Copenhagen Group will uphold:

- Principle 3: the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in employment and occupation.

Environment

Copenhagen Group will:



- Principle 7: support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

 Principle 10: Copenhagen Group will work against corruption in all its forms, including extortion and bribery.

As a Group we are looking for to an effective 2012, improving conditions and rights and benefits for all staff and other stakeholders, please ensure that your continued support remains focused on these principles whilst implementing all our business aims and objectives in 2012.

Yours sincerely,

Jeppe Handwerk
President & CEO
COPENHAGEN GROUP A/S

The report

A signed copy of this statement is attached at Annex 1, is published on our website and the individual company Facebook media pages, it has been distributed to all stakeholders.

Copenhagen Group and its subsidiaries has chosen to adopt policies and implement procedures in key areas in a schedule that can be addressed by the individual companies, allowing each company to address those areas that represent a priority in their business area or in which posses the largest risk towards the operations and management of projects.

As Copenhagen Group is still very much at the initial stages of development in terms of the application of the Global Compact we are showing in our COP for 2012 evidence in those areas most keenly affected by the individual companies' activities. Copenhagen Group is now taking the best practice from each of the leading companies and where relevant applying it as firm policy and procedure into the other companies, the follow up of this implementation will form the basis of reporting for next year's COP. This year's report will therefore highlight the two most significant measures taken in each of the principle areas by individual companies.

Human Rights Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and



Principle 2: make sure that they are not complicit in human rights abuses (For more information on the principles,

Assessment, Policy and Goals

Copenhagen Group places great value on the Human Rights of its employees and its preferred suppliers. The respect and support of human rights is not limited to the immediate workplace. Copenhagen Group is very conscious that it engages in a worldwide supply chain. Therefore, it is within the company's responsibilities to ensure that all operations involved in the supply process adhere to internationally proclaimed Human Rights.

Copenhagen Election is leading our initiatives into these principles and reports;

Policy

As an international company Copenhagen Election does not deal with any agents or companies who fail to respect human rights in any form. We adopt a nondiscriminatory policy, thus any discrimination of employees related to our business or our suppliers business based on age, gender, culture, religion, race or political affiliation is not tolerated.

Actions

Copenhagen Election and our local staff are engaged in regular supplier audits and visits to industrial premises where products procured for our projects are produced. During the inspections photographs are taken and conditions are monitored to satisfy us that all possible precautions to ensure a fit and healthy environment are undertaken. As of yet we have no formal procedure or reporting to cover these important factors but as we move into 2012 proper and commence our certification of ISO 9001 all such systems will be laid down, implemented and followed up on. Our suppliers are aware that Copenhagen Election is moving to a formal reporting structure this year and they have been further urged to introduce such initiatives themselves.

These pre-actions will ensure that our local business partners are aware of their commitment of respecting international proclaimed human rights. The benefits to our business will represent themselves in our ability to act with a greater degree of confidence with our own customers.

A major part of our projects are based in "remote geographic areas" or in "post conflict or developing" countries. The staff of Copenhagen Election are fully aware of the potential for discrimination against minority groups.

Copenhagen Election have informed all suppliers that it will take any appropriate action if we discover any breach of human rights. Copenhagen Election will under such circumstances immediately re-evaluation the level of cooperation with the involved supplier(s) to ensure that they firmly adhere to human rights principles in future or we will terminate the business with them forthwith.

Measurement of Outcomes

During all visits to suppliers in 2011, in China, Turkey, Egypt, Kenya and Denmark, no instances of Human Rights abuses have been recorded or witnessed.



Our objective for 2011 was to promote dialogue and inform all suppliers of the values and intentions of Copenhagen Elections to implement and support the Global Compact and it's principles.

All suppliers have willingly involved themselves in this dialogue, have shown support for and continue to communicate their understanding of our beliefs and requirements moving forward.

Our 2012 objectives

- 1. Introduce a formal procedure and reporting process to cover supplier visits and inspections, in compliance with a QMS and certification of ISO 9001.
- 2. Introduce a formal procedure for the reporting process of any instances of a breach of Human Rights whilst visiting or inspecting supplier premises and supply chains, in compliance with a QMS and certification of ISO 9001.

Group Statement on Human Rights

"Copenhagen Group have clearly stated and herein endorse our continued values of only dealing with suppliers which have a respect for and support of human rights throughout their entire supply chain. The performance of all our suppliers will be monitored and evaluated by us. We will encourage external and internal auditing of all production facilities in order to demonstrate such compliance on an ongoing basis."

"Copenhagen Group aims to have a greater appreciation of difficulties faced by minority groups and a greater understanding of the importance of the democratic process. Through our close relationships and communication with the preferred suppliers we will do our outmost to ensure Human Rights awareness is raised and compliance with internationally proclaimed human rights principles becomes an intrinsic part of combined business processes."

Anti-Corruption Principles

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

Assessment, Policy and Goals

Copenhagen Group being present in countries such as Afghanistan has been faced with difficulties arising from the pressure exerted by officials and commercial entities that are by culture determined to conduct business only with added incentives and unlawful payments, we have no tolerance of such practices.

In a continued effort to raise awareness Copenhagen Global A/S, now as the management team responsible for IM Jensen Worldwide based in Kabul and Khandahar, Afghanistan, has this year drafted and implemented a specific "Code of Ethics".



The Code of Ethics clearly defines the company's values in dealing with external stakeholder and enforces these procedures through clearly defined codes and disciplinary procedures.

Copenhagen Global's mission is "to provide high quality vehicle procurement solutions to the International Community", as such it is imperative that when both purchasing from suppliers and providing those products to clients that the supply is managed in an ethical manner. Our ability to externally integrate with suppliers and customers demands that we conduct business in the most professional, ethical and transparent fashion, this forms a distinct part of the companies value chain and reinforces that benefits of conducting business with Copenhagen Global.

All staff therefore have been clearly informed and consulted in drawing together the Code and have been asked to sign an agreement to this which is attached to their personnel contract, full enclosure is attached at Annex 2.

The Code of Ethics states:

Consistent with our operating principles, employees should strive to conduct all business dealings and relationships with integrity, honesty and respect to their fellow employees, customers, suppliers and others with whom Copenhagen Global A/S does business. No employee should knowingly permit any transaction to occur through his or her department that does not honour Copenhagen Global A/S.

Relationships with customers, manufacturers, suppliers, competitors and employees are to be based on fair dealing, on fair competition in quality, price and service and on compliance with applicable laws and regulations.

Copenhagen Global A/S does not permit or condone bribes, kickbacks or any other illegal, secret or improper payments, transfers or receipts. This prohibition applies both to the giving and the receiving of payments or gifts.

All payments and transfers of premium and other items of value to employees of other business or governmental entities or to such entities themselves shall be made openly and must be disclosed and authorized in advance by the principal, the customer and the Organization.

No employee shall offer, give or transfer any money or anything else of value for the personal benefit of any employee or agent of another entity for the purpose of:

Obtaining or retaining any business that the entity itself would not otherwise provide;

- Receiving any kind of favoured treatment that the entity itself would not otherwise provide; or
- Inducing or assisting such employee or agent to violate any duty to his employer or to violate any law.

No outside agent of any kind shall be used to circumvent the prohibition against bribes, kickbacks and other illegal, secret or improper payments. Fees, commissions and expenses paid to outside agents must be based upon proper billings, accurate record keeping and reasonable standards for services rendered.



Objectives for 2012

- 1. Copenhagen Global will work with Copenhagen Group A/S, in areas of support and learning, to implement the Code of Ethics across the other companies in the Group.
- Copenhagen Global will work with supply chain members and business partners to adhere to the anti-corruption principles, where possible requiring the implementation of similar Ethics codes.
- Copenhagen Global will develop and train all staff in procedures for dealing with exposure to attempts to bribe and corrupt, to include a reporting procedure in line with the QMS and ISO 9001 certification.

Implementation

- 1. The Code of Ethics has been endorsed by the Managing Director and distributed to all staff.
- 2. All staff have been appraised of and have signed a declaration of agreement with the Code of Ethics.
- 3. Copies of all signed declarations have been included with all employee staff contract records.

Measurement of outcomes

During the process of drafting the Code of Ethics communication with all staff was made through discussion groups, staff where invited formally and informally through anonymous reporting to report any attempts of corruption.

No instances of corruption or bribery have been reported for 2011.

A log will be created to review and schedule reports in line with the QMS and ISO 9001 certification.

How the company monitors and evaluates anti-corruption performance

Historical reporting of attempted corruption has been dealt with verbally without recourse to recorded procedures, consequent to the implementation of the code of ethics this practice will be supplemented with a formal reporting procedure as detailed above.

The company financial reports are monitored for accuracy by the CFO and all financial accounts are audited externally each year.

All projects in excess of \$10,000USD must be prepared and presented prior to approval and implementation, this project approval mechanism include a scrutiny of cash flow, suppliers, freight partners and project financing, everything is transparent. As a further step to maintain complete integrity all Projects are approved by the Managing Director then by the COO and CFO of Copenhagen Group prior to implementation. Thereafter projects are monitored and formally reviewed each week until completion, at the end of all projects a review is conducted in writing and passed through the same chain for endorsement and application of QMS standards.



In projects including formal contracts and purchase order in excess of \$100,000 USD the COO of Copenhagen Group must review and approve all legal agreements, where necessary directing such documents through the Copenhagen Group lawyer.

No evidence of corrupt practice has been uncovered to date.

Conclusion

This report is submitted to demonstrate our progress towards the full implementation of the Global Compact and all its principles. Copenhagen Group is fully aware that these principles have a vital part to play in how we conduct business, the key learning outcome for us this year has been to adopt these principles as core values of the organisation and to fully consider the aspirations and implications in everything we do.

As we move forward into 2012 we are also working on a full certified QMS process, we are seeing early on that as a value base the Global Compact allows us to reflect our values in all our essential systems.

This report is submitted for your kind consideration.

Jeppe Handwerk President & CEO

COPENHAGEN GROUP A/S

10th March 2012, Copenhagen, Denmark

COPENHAGEN GROUP A/S

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March 2012

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Yours sincerely,

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Copenhagen Global A/S Code of Ethics

Copenhagen Global A/S values and the United Nations Global Compact

Copenhagen Global A/S as a subsidiary of Copenhagen Group is a signatory to the UN Global Compact, our value statement is centred on the ten principles defined by the UNGC.

"Striving to make a difference by consistently applying the principles of the UN Global Compact"

The UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption enjoy universal consensus and are derived from:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption. In addition to the below detailed Code of Ethics all staff are required to recognise and support the Organizations involvement and adherence to the principles of the UN Global Compact.

1. Code of Ethics

Copenhagen Global A/S prides itself on high standards of excellence. We expect our employees to personify these ideals in their dealings with persons both inside and outside the Organization and whenever the employee is on or could be assumed to be on Copenhagen Global A/S business outside Copenhagen Global A/S offices. The following Code of Ethics and Employee Conduct are intended to provide guidelines for the professional, ethical, legal and socially responsible behaviour we expect of our employees.

It is impossible for this policy to cover every situation that may arise. When you have a question, ask your manager.

2. Professional Integrity

Consistent with our operating principles, employees should strive to conduct all business dealings and relationships with integrity, honesty and respect to their fellow employees, customers, suppliers and others with whom Copenhagen Global A/S does business. No employee should knowingly permit any transaction to occur through his or her department that does not honour Copenhagen Global A/S.



Relationships with customers, manufacturers, suppliers, competitors and employees are to be based on fair dealing, on fair competition in quality, price and service and on compliance with applicable laws and regulations.

3. Bribes and Kickbacks

Copenhagen Global A/S does not permit or condone bribes, kickbacks or any other illegal, secret or improper payments, transfers or receipts. This prohibition applies both to the giving and the receiving of payments or gifts.

All payments and transfers of premium and other items of value to employees of other business or governmental entities or to such entities themselves shall be made openly and must be disclosed and authorized in advance by the principal, the customer and the Organization.

No employee shall offer, give or transfer any money or anything else of value for the personal benefit of any employee or agent of another entity for the purpose of:

Obtaining or retaining any business that the entity itself would not otherwise provide;

- Receiving any kind of favoured treatment that the entity itself would not otherwise provide; or
- Inducing or assisting such employee or agent to violate any duty to his employer or to violate any law

No outside agent of any kind shall be used to circumvent the prohibition against bribes, kickbacks and other illegal, secret or improper payments. Fees, commissions and expenses paid to outside agents must be based upon proper billings, accurate record keeping and reasonable standards for services rendered.

4. Gifts and Entertainment

Except in connection with and specifically pursuant to programs officially authorized by the Organization, employees may not accept, directly or indirectly, any money, objects of value, or premiums from any person or Organization that has been or is doing or seeking business with the Organization. All employees must disclose transactions of this nature to his/her manager and the Managing Director. Providing excessive gifts or entertainment to others who may represent potential business is prohibited.

Employees may accept only business-related meals, entertainment, gifts or favours when authorized by management and when the value involved is not significant and clearly will not create an obligation to the donor. The value of any meal, gift, etc. shall not exceed 250DKK per instance, without express approval of the Organization.

Any payments or transactions must be accurately recorded in the Organization's books and records and must be consistent with applicable law and accepted financial practice.

5. Conflicts of Interest

No employee shall use his or her position with the Organization or information acquired during employment in a manner that may create a conflict, or the appearance of a conflict, between the employee's personal interests and those of the Organization.



All activities conducted as an employee of the Organization should always place the lawful and legitimate interests of the Organization over personal gain.

Absent written authorization by Copenhagen Global A/S, no employee shall be affiliated with any buyer, purchasing agent or provider of goods or services to the Organization. Affiliations include family relationships, marriage and/or ownership, whether complete or partial. Such affiliation generally is inconsistent with the employee's capacity to deal equitably with all buyers, to fairly and honestly service principals and to discharge his or her responsibility to the Organization.

If an employee has any reason to believe there may be a conflict of interest, he or she has an obligation to immediately disclose the matter to his/her immediate manager or the Managing Director.

6. Confidentiality

Except as properly authorized by the Organization, it is the responsibility of all employees to maintain the confidentiality of:

- Proprietary information of the Organization, which generally includes any information provided to an employee related to the Organization that is not public information through no fault of the employee; this includes, for example, information related to: Copenhagen Global A/S employee salaries, employment policies, personnel files, Copenhagen Global A/S customer lists and/or specific information regarding Copenhagen Global A/S customers, potential customer lists and/or specific information regarding potential customers, funding agencies, organizations with which Copenhagen Global A/S conducts business, Copenhagen Global A/S business strategies, business plans, Copenhagen Global A/S finances, proposals, drafts, research, Copenhagen Global A/S marketing plans.
- Information entrusted to the Organization by principals or customers that is otherwise not readily available to the public and/or that is given to Copenhagen Global A/S on the condition that it be maintained as confidential.

Employees should refrain from discussing confidential Organization business with outsiders and with anyone else who does not have a legitimate need to know the information.

Employees should refer outside inquiries regarding the Organization to the persons in the Organization who are authorized to respond to the particular inquiry.

7. Accurate and Complete Accounting

Employees are responsible for timely record keeping for all Organization assets, liabilities, revenues and expenses. Compliance with generally accepted accounting principles and controls is required. All books, records and documents must accurately and comprehensively describe the transactions they represent.

No unrecorded fund, reserve, asset or special account shall be set up or maintained for any purpose. No false or fictitious entries shall be made in books, records, accounts, or in Organization communications for any reason. No payment or transfer of funds or assets (such as tangible and intangible premiums) shall be made for any purpose other than that described by the supporting documents and specifically as authorized by the Managing Director.



8. Administration of Policy

All employees who suspect violations of the letter or spirit of this policy have an obligation to report their concerns to the Organization's management or the Managing Director, any employee with similar concerns about the Managing Director should report the matter direct to the COO or CEO of Copenhagen Group.

Matters of concern include pressure exerted by suppliers, customers, Organization personnel or others to utilize accounts in an unauthorized manner or to take or enable other actions inconsistent with authorized Organization procedures and policies of this Code.

All allegations of improper or illegal behaviour will be investigated promptly and thoroughly. The investigation shall remain as confidential as possible, except as necessary for resolution and other work-related reasons. Those conducting the investigation shall use their best efforts to respect the privacy of all persons involved.

No adverse action shall be taken or permitted against anyone who, in good faith, communicates legitimate concerns to the appropriate persons. While an investigation will be facilitated if the employee identifies himself or herself, the Organization will accept and investigate matters submitted anonymously.

9. Employee Misconduct

To ensure orderly operations and to provide the best possible work environment, Copenhagen Global A/S expects that employees will not engage in misconduct. Any misconduct by an employee may result in disciplinary action, including for example, suspension without pay, counselling, an oral or written warning or immediate termination of employment, as determined at Copenhagen Global A/S sole discretion.

The immediate supervisor, manager or director must approach corrective measures in an objective manner. If the employee's performance of an assigned task is the issue, the supervisor, manager or director should generally look to see that proper instructions, appropriate orientation and training have been given and that the employee is aware of the job expectations. Not only single incidents, but also patterns of poor performance should be of concern as these are indicative of overall performance. If misconduct is the issue, the supervisor, manager or director should take steps to make sure that the employee has been made aware of the company's policies and regulations regarding the infraction. If in either case appropriate instruction or information was not communicated, a plan for such communication should be immediately developed in conjunction with Human Resources and reviewed with the employee.

Examples of misconduct are included on the following list. This list is intended to be representative of the types of activities that may result in disciplinary action, including termination. It is not exhaustive, and is not intended to be comprehensive, and does not change the employment at will relationship between the employee and Copenhagen Global A/S.

10. Criminal Misconduct

- Theft;
- Conviction or plea of no contest of a felony, or of a misdemeanour involving illegal drugs, violence or a crime of moral turpitude;
- Possession of dangerous weapons on the premises;



- Larceny or unauthorized possession of, or the use of, property belonging to any co-worker, visitor or customer of Copenhagen Global A/S; or
- Marring, defacing or other wilful destruction of any supplies, equipment or property of Copenhagen Global A/S.

11. Workplace Misconduct

- Wilful violation of National and/or Local Law when acting in one's capacity as an Copenhagen Global A/S employee;
- Breach of trust or dishonesty;
- Fighting or serious breach of acceptable behaviour in the workplace;
- Falsification of Copenhagen Global A/S records;
- Insubordination;
- Gross negligence;
- Deliberate non-performance of work;
- Unauthorized possession, use or copying of any records that are the property of Copenhagen Global A/S;
- Unauthorized posting or removal of notices from bulletin boards;
- Unauthorized absence from work during regularly scheduled work hours;
- Failure of an employee to call or directly contact his/her manager when he/she will be late or absent from work;
- Excessive absenteeism or lateness;
- Gambling, conducting games of chance or possession of such devices on the premises or during work hours; or
- Malicious gossip.

12. Copenhagen Global A/S Policy Misconduct

- Wilful violation of an established policy or rule;
- Violation of Copenhagen Global A/S policies prohibiting discrimination and harassment;
- Violation of Copenhagen Global A/S policies encouraging and ensuring equal employment opportunities;
- Violation of the Drug-Free Workplace Policy;
- Violation of Copenhagen Global A/S Conflict of Interest/Outside Employment Policy and/or Confidentiality Policy; or
- Engaging in retaliation against a legitimate complainant.

13. Management and Communication

It is the responsibility of Management to set a positive example for junior staff. Therefore, managers should treat subordinates with respect for their professionalism and concern for their well-being, and provide them with a safe, congenial working environment, encouraging teamwork in the process.

Appropriate communication content and tone contributes to a respectful workplace. It is the expectation of Copenhagen Global A/S that all company communications will be courteous. This includes emails, phone calls, letters, memos and conversation. Principles of courteous communication include:

- active listening;
- offering different perspectives rather than criticizing comments; and
- Commenting on, agreeing, disagreeing or supporting ideas as opposed to people.



No Code of Conduct can spell out the appropriate conduct and ethical behaviour for every situation with which an employee may be confronted. This Code is not intended as a replacement for good judgment and personal responsibility.

14. Violations

Employees with complaints regarding violation of the Code of Conduct should contact the Managing Director who will investigate the complaint according to the Reporting and Resolution of Discrimination or Harassment Complaints Policy as detailed in the Employee Handbook. Violation or deviation from the standards provided in this Code or any Supplemental Policies will result in disciplinary action, which may include, but not be limited to:

- oral or written warning;
- disciplinary probation or suspension;
- reduction in salary and/or demotion; or
- Dismissal from employment.

15. Resolution Internal Complaint Procedures

It is the policy of Copenhagen Global A/S to provide a work environment where all employees are treated with respect and fairness. Employees who believe that they have been treated unfairly in the application of an Copenhagen Global A/S policy, benefit or procedure may request and receive a timely investigation and reasonable disposition of the claim without fear of interference, coercion, discrimination or reprisal. We will make every effort, as permitted by law, to keep all inquiries, complaints and investigations confidential, except to the extent necessary for investigation or resolution.

If you experience any job-related discrimination or harassment or if you believe you have been treated in an unlawful, discriminatory manner or have been unlawfully harassed, promptly report the incident to your supervisor. If you believe it would be inappropriate to discuss the matter with your supervisor, report it directly to Managing Director. Once made aware of your complaint, Copenhagen Global A/S is committed to commence an immediate, thorough investigation of the allegations. Your complaint will be kept confidential to the maximum extent possible.

If, at the completion of the investigation, Copenhagen Global A/S determines that an employee is guilty of discriminatory or harassing behaviour, appropriate disciplinary action will be taken against the offending employee.

Copenhagen Global A/S prohibits any form of retaliation against any employee for filing a bona fide complaint under this policy or for assisting in the complaint investigation. However, if, after investigating any complaint of unlawful discrimination, unlawful harassment or violation of this Code of Conduct, Copenhagen Global A/S determines that an employee intentionally provided false information regarding the complaint, disciplinary action may be taken against the one who gave the false information.

At appropriate points during the investigation and at the conclusion of the investigation, the complainant will be updated, as necessary and advisable, on investigative findings and whether any action was taken by Copenhagen Global A/S.



Annex A to Copenhagen Global A/S Code of Ethics

& Employment Contract



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www.unglobalcompact.org

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Anti-Corruption

 Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

All staff must be aware of the ten principles and apply them in their daily activites, the rights declared within these principles will be afforded to you by Copenhagen Global A/S.

•	[print] have received, read and fully omply with the policy on the Code of Ethics, Employee Conduct the Organizations involvement and adherence to the principles of the
Signature:	Date: