

CSR Policy

18 February 2022

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General

Our CSR Policy confirms our commitment to acting ethically in the performance of our activities. The policy sets out our commitments in relation to corporate responsibility, human rights and environment and climate.

The Group has a number of policies for which this CSR Policy and our Code of Conduct form the overall framework.

This means that we are committed to acting in accordance with this policy in relation to employees, economy and finance, environment, occupational health and safety, customers, market conduct, competitors, business partners and suppliers.

Scope

This policy applies to MT Højgaard Holding A/S and the companies owned by MT Højgaard Holding.

Objective and follow-up

We will manage sustainability issues in a manner that ensures that all employees and suppliers are aware of our views and guidelines.

One of the means by which we follow up on compliance with our CSR Policy is by carrying out a human rights due diligence. Further information on our human rights due diligence is provided in our Human Rights Policy. Our Supplier Code of Conduct clarifies our expectations of our suppliers.

The channels through which we communicate our initiatives and results include our annual Sustainability Report, which can be viewed [here](#).

The Group must have good, respectful and constructive community relations focusing on the following:

- We must ensure that every single part of the Group strives to understand and act constructively together with the community of which it is a part
- In the communities in which we carry out activities we must base our actions on respect, accountability, dialogue and mutually realistic expectations

The Group's CSR Policy consists of the following three key principles:

1. Business conduct

The Group must act with credibility and integrity in relation to:

Laws and directives

All our business activities must comply with applicable Danish and international laws, and competition must be on fair and equal terms.

All employees must comply with laws, directives and internal policies. Any breaches must be reported either:

1. directly to management or HR, which must take appropriate action, or
2. anonymously through our whistleblowing system.

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Anti-corruption

We do not tolerate any form of corruption, including extortion, bribery or facilitation payments.

We must not accept bribery, either directly or indirectly, or engage in any other illegal practices.

We must never offer or give any form of gift or payment that constitutes or could be construed as bribery.

2. Human rights

We will perform our activities in accordance with ethical standards. This means that, as a minimum, we will always comply with the laws in the countries in which we operate. The MT Højgaard Holding Group is also committed to respecting internationally recognised human rights. These are, as a minimum, the rights established in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and The International Covenant on Economic, Social and Cultural Rights as well as the principles on fundamental rights established in the ILO Declaration on Fundamental Principles and Rights at Work from 1998.

We represent a corporate culture that protects internationally recognised human rights in order to avoid contributing to any human rights violations in connection with the execution of our projects.

In addition, we expect our partners to comply with the same principles as set out in this policy.

Freedom of association

We maintain the right to freedom of association and recognise the right to collective bargaining pursuant to the applicable ILO Conventions.

Forced labour

We do not accept forced labour.

Child labour

We do not accept child labour, as defined under the relevant, applicable ILO Conventions. If a higher minimum age and/or other rules for compulsory schooling are set in national legislation, then these shall apply.

Discrimination

We recruit our employees based on their work qualifications and treat them on equal terms – regardless of ethnic or national origin, gender, race, religion or belief, political views, sexual orientation, age or disability.

Pay

We ensure that, as a minimum, our employees' pay and benefits meet the statutory minimum limits in the countries in which we operate.

Working hours

We comply with the law and the standards governing working hours that apply to our activities in the countries in which we operate.

Occupational health and safety

We are committed to preventing injuries and work-related illnesses by ensuring that our employees receive training and instructions in how to carry out their work.

As a Group, we continuously strive to improve our health and safety performance to enable us to continue to carry out all work in a safe and responsible manner.

Suppliers

We will only enter into contracts with direct contract partners/suppliers that comply with the laws in the countries in which they are present and support and respect internationally recognised human rights.

3. Environment and climate

The Group wants to care for the environment and the climate. We do that by promoting positive and limiting negative impacts on our surroundings.

We want to ensure that our employees are always trained to perform their tasks in an environmentally sound manner in accordance with applicable rules.

In practice, this means that we establish appropriate procedures for addressing potential and actual negative impacts on the environment, including, but not limited to:

- limiting the use of scarce natural resources, including energy and water
- using and installing energy and resource-efficient materials and components, including low water consumption appliances
- taking steps to reduce emissions of noise, dust and pollutants during construction and maintenance works
- limiting waste production
- preparing construction and demolition waste for reuse, recycling or other materials recovery, including fill in accordance with the waste hierarchy
- handling and disposing of hazardous substances in a safe manner
- using building components and materials that comply with existing chemicals legislation