

MT HØJGAARD HOLDING



Code of Conduct

February 2024

Purpose and scope

MT Højgaard Holding and its subsidiaries (the “Group”) have an obligation and a commitment to act professionally, fairly and with integrity in all activities. All our business activities must be conducted in compliance with applicable Danish and international law and on the basis of fair play and a level playing field. We observe the standards of the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO guidelines on international standards and fundamental labour standards.

This Code of Conduct (CoC) defines the framework for the rules to be observed by and the conduct required of all our employees across the Group within human rights, labour rights and the environment and climate. It also frames our expectations for and the code of conduct we have established for our business partners in the value chain with respect to these areas.

For several of the areas described in this CoC, we have drafted a separate policy. Where relevant, this CoC includes references to the specific policies.

Focus areas

Across the Group, we focus specifically on the following areas, and we require of all our employees that they comply with the CoC in these respects.

Anti-corruption and anti-bribery

We take exception to all forms of corruption or quasi-corruption involving the abuse of entrusted power or confidence in a professional context for personal gain. Personal and professional interests cannot in any way be intertwined, and the giving or receipt of any form of gifts or payments constituting or capable of being perceived as bribery is therefore not allowed.

The Group has a separate anti-corruption policy, which is available here: [Corporate governance – MTHH](#)

Diversity and inclusion

We strive to treat all colleagues and business partners with respect. We give high priority to promoting diversity, equal opportunities and inclusion as fundamental elements of a good working life and good collaborative relationships. We therefore have a duty to support diverse and inclusive behaviour so that all people, regardless of gender, age or background, are treated equally and with respect.

The Group has a separate equality and diversity policy, which is available here: [Corporate governance – MTHH](#)

Human rights

As a signatory to the UN Global Compact, the Group is required to comply with the ten fundamental principles in the area of human rights. We want our management and employees to act in an ethically appropriate manner and respect human rights.

In performing their duties, our employees are required to observe ethical standards so as to ensure that we, as a Group, are not complicit in human rights abuses, do not tolerate child labour or any form of forced or compulsory labour. We also have a duty to ensure appropriate business conduct, supporting a fair, safe and healthy working environment and working conditions. This means that we comply with the rules on working hours and wages set out in the official agreements concluded in the countries in which we operate and reflecting the work performed.

The Group has a separate human rights policy, which is available here: [Corporate governance – MTHH](#)

Climate and environment

As a Group, we have a duty to reduce the climate impact of all our projects and any activities derived from those projects. We make targeted efforts to reduce our direct and indirect climate and environmental impact. Areas given particularly high priority include reducing our greenhouse gas emissions, improving our waste management and delivering sustainability-certified construction projects.

We stay up to date on new environmental and climate regulations and requirements, and we seek to implement new initiatives to be complied with across the Group – in our core operations, processes and business models.

The Group has a separate environmental and climate policy, which is available here: [Corporate governance – MTHH](#)

Health and learning

The Group is committed to ensuring a healthy and safe working environment. Preventing work-related accidents and attrition is a constant high priority for us. We do not accept any negligent conduct that may jeopardise health and safety. We are committed to preventing work-related injuries and work-induced illness by ensuring that our employees are trained and instructed in performing their duties and by making adequate equipment available. All employees have a duty to handle equipment at our construction sites with due care and to use the equipment responsibly. We also have a duty to keep our construction sites tidy and maintain our equipment in order to reduce the risk of accidents.

We strive continuously to strengthen our health and safety efforts to ensure that work is carried out fully adequately in terms of safety and health.

Every company in the Group has a health and safety policy, which is a supplement to this CoC. These health and safety policies are available on the intranet for the individual company.

Social responsibility for society at large and local communities

All employees have a duty to show respect and responsibility for the communities affected by the projects we engage in. This means that we have a duty to listen and respond to concerns raised by business partners on our projects as well as by the people living in the affected communities, including in particular in terms of preventing and mitigating nuisances in the form of noise, dust and restriction of access roads.

Protection of confidential information and use of the company's property

All employees of the Group have a duty to use data responsibly and to only process data which are relevant to performing the task at hand. Data belonging to the Group are not to be disclosed to any third parties, whether within or outside the Group.

We have a duty to use IT systems responsibly and within the framework of the law. Our IT systems are to be used for work-related purposes only.

Reporting and monitoring

A range of initiatives have been established across the Group to monitor and follow up on compliance with our human rights, labour rights and environmental and climate objectives. This also applies to our business partners where the CoC has an impact. We have established procedures for reporting and collecting data across the Group. Some of these data are disclosed annually in the sustainability report.

If any of our employees become aware that a colleague or business partner fails to comply with the rules and obligations of this CoC, they have a duty to report this. All reports of non-compliance with rules and obligations may be submitted anonymously through the Group's whistleblower scheme, which is available here: [Corporate governance – MTHH](#)

This CoC has been approved by the Executive Board of MT Højgaard Holding and is revised once annually. Please direct any questions relating to this CoC to our Group Legal Department.

Søborg, February 2024