

Data ethics

1. Introduction

- a. This policy describes our data ethics and the principles that apply to how the MT Højgaard Holding Group processes data ethically correct, responsibly, and transparently.
- b. Our policy on data ethics aims to clarify how the MT Højgaard Holding Group works with data ethics and data use, as well as to set a framework for ethical data behaviour. The policy shall support and supplement the MT Højgaard Holding Group's CSR and privacy policy.

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2. Background

- a. On 1 January 2021, new legislation came into force for large and listed companies in Denmark with a duty to report on data ethics. The purpose of the legislation is to provide transparency into how companies work with data and encourage companies to take responsibility for how they handle data, including, but not limited to, personal data.
- b. MT Højgaard Holding Group's activities focus primarily on construction and real estate project development.

3. Application

- a. The MT Højgaard Holding Group is increasingly processing data concurrently with the digital transformation. The MT Højgaard Holding Group's policy on data ethics is therefore not limited to the processing of personal data, but covers all types of data processed. This policy is group-wide for all MT Højgaard Holding Group companies and binds all employees.

4. Principles of data ethical processing

- a. The MT Højgaard Holding Group is dedicated to being aware of its corporate social responsibility and works purposefully to mature and manage the construction industry in a responsible direction. In this regard, the MT Højgaard Holding Group acknowledges that data ethics develop alongside values in the surrounding society, which is why the principles must be continuously assessed and revised to avoid behaviour that is not in accordance with data ethics principles.
- b. The guiding principles for data ethics, as described below, set the ethical standard for the use of data in the MT Højgaard Holding Group and are based on the Charter of Fundamental Rights of the European Union.
- c. Human autonomy must be a priority in all data processes. In the MT Højgaard Holding Group's work with ethically correct processing of data, our starting point will always be that individuals are in control when data is handed over to us, and that transparency can be achieved in the individual data processes.
- d. Processing of data takes place with respect for the customer's privacy and under the protection of personal data. MT Højgaard Holding Group processes personal data in accordance with our GDPR policy and only processes data that is necessary to fulfill the purpose of the processing.

- e. The MT Højgaard Holding Group will always ensure the dignity of the individual. We do not use data brokers and do not sell personal data to third parties. We do not use sensitive personal data ("data regarding race, ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade union membership, genetic data, biometric data, health data, or data concerning a natural person's sexual life or sexual orientation") in connection with marketing.
 - f. Accountability is exercising due diligence when using new technology to ensure orderliness in everything we do. Everyone in the MT Højgaard Holding Group must contribute to responsible and ethical processing of data.
 - g. A "best practice" level of security must be implemented in and around the technologies used to process data. The security measures must include technical as well as organisational measures.
 - h. The MT Højgaard Holding Group does not use artificial intelligence, as artificial intelligence is not an integral part of our business strategy or business activities.
 - i. The MT Højgaard Holding Group only uses data that is necessary, factual and legitimate in relation to the individual, and is in the interest of the individual, and without exposing the individual to discrimination or stigmatization.
5. Responsibility and follow-up
- a. The Board of Directors shall be responsible for the preparation and updating of this policy. The Board of Directors assesses on an ongoing basis and at least once a year whether the policy needs to be updated.
 - b. The daily work with data ethics takes place in the group's relevant business areas. Reporting of the group's work with data ethics is handled by the Head of Group Legal Affairs, who reports significant risks to the MT Højgaard Holding Group's Executive Management.

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