



Code of Conduct for employees

November 2024

Purpose and application

In MT Højgaard Holding and its subsidiaries (hereinafter 'the Group'), we have a duty and a strong desire to behave professionally, credibly and responsibly in all our activities. All business activities must comply with the Danish and international legislation in force at any given time and be conducted on fair and equal terms of competition. In addition, we follow the standards of the UN Guiding Principles on Business and Human Rights (UNGP), the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO Guidelines on International Standards and Core Labour Standards.

This Code of Conduct (CoC) provides a framework for the rules and behaviour we want our employees to follow within human rights, labour rights and environment and climate. There is a separate policy for several of the areas described. Reference is made to this where relevant.

We have a separate CoC for our suppliers, which sets the framework for the behaviour we as a group want from our business partners. Supplier CoC can be found here: [Governance - MT Højgaard Holding \(mthh.dk\)](#)

Focus areas

In the Group, we have a special focus in the following areas, which all employees have an obligation to follow.

Anti-corruption and bribery

The Group strongly condemns any form of corruption or corruption-like behaviour where people abuse the power or trust they have been given through their work for personal gain. This means that you as an employee must not mix personal and professional interests by, for example, accepting gifts, favours or other forms of remuneration that may influence or give the impression of influencing your business decisions. You must also not use company funds for purposes or payments that can be defined as bribery or bribery-like behaviour.

The Group has an independent anti-corruption policy that provides guidance for you as an employee. The anti-corruption policy can be read here: [Virksomhedsledelse - MTHH](#)

Diversity and inclusion

As a group, we want to treat everyone with respect. We emphasise diversity, equal opportunities and inclusion as fundamental elements for a good workday and collaboration. As an employee, you therefore have a duty to behave in a way that helps create a work environment where everyone, regardless of gender, age and background or other similar factors, feels valued, respected and has equal opportunities, and where no one is subjected to discrimination, harassment or exclusion.

The Group has an independent equality and diversity policy that guides you as an employee. The policy can be read here: [Virksomhedsledelse - MTHH](#)

Human rights

The Group acts in accordance with the UN Guiding Principles on Business and Human Rights (UNGP), the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO Guidelines on International Standards and Core Labour Standards. Against this background, it is our duty as a group to act ethically and respect human rights.

For you as an employee, this means that in the performance of your work, you are obliged to comply with ethical standards that include not contributing to human rights violations, not tolerating child labour or any form of forced labour. You are also committed to ensuring ethical business behaviour that supports a safe, healthy and fair physical and mental working environment and working conditions. In addition, you must contribute to avoiding social dumping by complying with working hours and wages according to the official agreements that apply at your workplace and that reflect the work performed.

The Group has an independent human rights policy, which is a guideline for you as an employee. The policy can be read here: [Virksomhedsledelse - MTHH](#)

Climate and environment

As a group, we have an obligation to reduce our environmental impact on all our projects and in the activities derived from the projects. Reducing our direct and indirect climate and environmental impact is a Group priority. Areas of particular priority are reducing greenhouse gas emissions, improving waste management and ensuring the phasing out of materials with unwanted chemistry. This means that you as an employee must contribute to reducing energy and fuel consumption in the activities you perform and follow the waste sorting principles that apply to the legislation and the location where you work. If you work with potentially harmful materials, you must ensure proper use, storage and disposal.

As an employee, you need to stay informed about new environmental and climate regulations and requirements in relation to the specific activities you perform. This applies to implementation in operations, processes and business models.

The Group has an independent climate and environmental policy, which is a guideline for you as an employee. The policy can be read here: [Virksomhedsledelse - MTHH](#)

Health and learning

The Group is committed to maintaining a healthy and safe working environment. The focus must always be on preventing work-related accidents and attrition. Negligent behaviour that may endanger safety or health is not accepted. As an employee, you have a duty to prevent injuries and work-related illnesses by participating in relevant training and reading instructions before carrying out your work. You must also check that you have sufficient and relevant equipment, including safety equipment, available to perform your specific tasks. As an employee, you have a duty to take care of the equipment provided for your work, and you must also ensure that you use the equipment responsibly. Finally, you have a duty to clean up and maintain equipment to minimise the risk of accidents.

The group is continuously working to improve its health and safety efforts so that all employees can work in a safe and healthy manner. Each company has a health and safety policy, which you

can find on your company's intranet.

Social responsibility for society and neighbourhood

All employees are obligated to show respect and responsibility towards the community we surround ourselves with. This means that you have an obligation to listen and respond to areas for improvement for users and the local environment on the projects and/or construction sites you work on. This especially applies to the prevention and mitigation of nuisances, such as noise, dust, light, vibration and access restrictions.

Protection of confidential information and use of company property

Everyone in the Group is obliged to use information responsibly and only process information that is relevant in relation to performing the specific job. As an employee, you must not disclose information that belongs to the Group to unauthorised parties, either inside or outside the Group.

You have a duty to use IT systems responsibly and within the law. The systems may only be used for work-related tasks.

The Group has an independent IT policy, which is a guideline for you as an employee. The policy can be read on your company's intranet.

Reporting and monitoring

Several initiatives have been established across the Group to monitor and follow up on human rights, labour rights and the environment and climate. Procedures have been established for reporting and data collection across the entire Group. Parts of this reporting appear annually in the ESG reporting.

If you as an employee have information or suspicion of illegality, serious irregularities or anything else at work that you find unacceptable in relation to the direction and behaviour set out in this Code of Conduct, you have a duty to report this. You can report anonymously via the Group's reporting options, which you can find here: [Klager og indberetninger - MT Højgaard Holding \(mthh.dk\)](#)

This Code of Conduct is approved by the Board of Directors of MT Højgaard Holding and is revised once a year. If you have any questions, please contact Group Legal, which is responsible.

Søborg, november 2024