

MT HØJGAARD HOLDING

# Code of Conduct - external

November 2024

## Purpose and application

In MT Højgaard Holding and its subsidiaries (hereafter referred to as "the group"), we have a strong desire to conduct ourselves professionally, credibly, and responsibly in all our activities. All business activities must comply with the applicable Danish and international laws and be conducted under fair competitive conditions. Consequently, we align ourselves with and respect the standards in accordance with the UN Global Compact's principles, the UN guidelines on business and human rights, the OECD guidelines for multinational enterprises, and the ILO guidelines for international standards and fundamental labour standards.

This policy sets the framework for the rules and behaviour we expect from our business partners regarding human rights, labour rights, and environmental and climate issues. The group's business partners include all who supply products, labour, or services in the first tier, including our business partners' parent and subsidiary companies and other affiliated companies.

The group requires all our business partners to comply with this external Code of Conduct (eCoC) and to respect and ensure, to the greatest extent possible within their sphere of influence and capacity, compliance with both the specific requirements of the policy and the mentioned international standards and guidelines. It is the responsibility of our business partners to ensure that their direct and indirect business partners follow the international principles listed above and outlined in this policy. In cases where business partners engage subcontractors to carry out a task, the business partner is obligated to ensure that the subcontractors are made aware of and comply with this external Code of Conduct

## Focus areas

In the group, we strive to develop long-term business relationships that form the basis for collaboration, value, and development. Therefore, we seek to collaborate with business partners who promote responsible business conduct.

### ***Responsible conduct***

Business partners are required, to the greatest extent possible within their sphere of influence and capacity, to take responsibility for identifying, managing, and preventing negative impacts on the climate and environment, human rights (including labour rights), and the fight against bribery and corruption in accordance with international guidelines.

Therefore, we encourage our business partners to undertake social responsibility by publishing relevant policies in this area and conducting due diligence to identify, manage, and prevent negative impacts in the mentioned areas.

### ***Work environment***

The group requires business partners to act ethically and support a safe and healthy physical and psychological work environment. Negligent behaviour that endangers these is not accepted.

Business partners are obligated to prevent accidents and injuries by ensuring that employees are trained and instructed to perform their work and by providing adequate protective equipment and other necessary tools. It is also required that all employees are aware of the types of chemicals they may encounter during their work and guidelines for handling them safely.

## ***Human rights***

All business partners are obligated to adhere to ethical standards in their activities, ensuring that the group does not contribute to or is associated with human rights violations. Suppliers must neither directly nor indirectly use forced or compulsory labour, be involved in child labour, or prevent the right to organize or engage in collective bargaining. We have assessed that there may be potential risks regarding the adherence to labour rights within our value chain, and therefore, we require special attention to ensure compliance in the following areas

### Forced labour:

- Wages and working conditions must comply with or be comparable to the applicable collective agreements.
- Freedom rights must be guaranteed, ensuring that passports or other identification papers are not confiscated during the employee's stay in Denmark.
- Housing provided to employees in connection with their work must meet the requirements set by the Danish Working Environment Authority.

### Child labour:

- National legal requirements regarding the minimum age for employment must be complied with.
- It must be ensured that individuals under the age of 18 years do not work in hazardous conditions.

### Wages and working hours:

- Business partners must comply with applicable laws and regulations regarding wages and working hours in the countries where they operate.
- The group recognizes that overtime may be necessary but expects our business partners to organize work so that overtime is limited to a level that allows a reasonable balance between work and leisure for employees.

### Unionizing:

- It must be ensured that employees have the right to freely form or join trade unions without interference or reprisals (or threats thereof) from the employer. Likewise, employees have the right to remain unaffiliated with any trade union.

- Effective protection of union representatives and the facilities they need to perform their duties must be ensured.

## ***Anti-corruption and bribery***

The group requires business partners to take a strong stance against any form of corruption or corruption-like practices and not to be involved in corruption in any form.

The group expects all business partners to have an active stance on matters of corruption and to have policies or clear guidelines on how to handle these issues, both in relation to authorities, partners, and other stakeholders.

## ***Diversity and inclusion***

The group expects business partners to treat everyone with respect. The group emphasizes diversity, equal opportunities, and inclusion as fundamental elements for a good working environment and successful collaboration. Therefore, we expect our business partners to exhibit diverse and inclusive behaviour, and we require that there is no discrimination based on gender, age, ethnicity, or any other background.

## ***Climate and environment***

As a group, we are committed to reducing our environmental impact on all our projects and the activities derived from these projects. We work diligently to reduce our direct and indirect climate and environmental impact.

The group expects business partners to likewise establish appropriate procedures for managing potential and actual negative impacts on the climate and environment. In practice, this means that our business partners must manage the various environmental aspects of their operations, including:

### Noise, dust & construction site nuisances:

- The business partner must take measures to reduce dust and noise, as well as disturbances from lighting and affected access roads during construction and maintenance work.

### Climate impact and energy:

- Electricity and heat consumption must be reduced, for example, for lighting and heating at construction sites and production facilities, and through the use of renewable energy sources.
- Fuel consumption should be reduced, for instance, by increasing the proportion of electric vehicles and machinery, and implementing measures for more fuel-efficient use, such as reducing idling and using bio-based fuels.

- To the greatest extent possible, low climate impact should be prioritized in the selection of materials, for example, through environmental product declarations, optimizing material quantities, and processes.
- Efforts should be made to reduce energy consumption in finished buildings.

## Circular economy and waste:

- Procurement of materials from recycling and reuse should be prioritized.
- Principles of design for disassembly and adaptation should be followed to the greatest extent possible, ensuring that materials can be dismantled at the end of their lifecycle.
- Business partners must contribute to reducing waste and ensuring proper waste sorting, maximizing the proportion of waste destined for recycling, reuse, and material recovery in accordance with the Statutory Order on Waste and local/municipal guidelines.

## Pollution and chemicals:

- Current Danish and European legislation regarding the use of chemical products must be adhered to, including the use of materials available within the EU.
- To the greatest extent possible, products with low pollution levels should be used, prioritizing products that comply with the requirements of EU taxonomy and certification schemes related to chemicals.
- To the greatest extent possible, products with recognized environmental labelling and certifications should be used, such as the Nordic Swan Ecolabel, Indoor Climate Label, and FSC (Forest Stewardship Council).
- Hazardous materials must be handled properly and in accordance with regulatory requirements.

## Biodiversity

- The business partner must, to the greatest extent possible, implement measures that consider protecting and preserving biodiversity. This includes actions on the construction site, in the surrounding environment, and through indirect impacts such as material

## **Reporting and monitoring**

The group has established several initiatives for monitoring, controlling, and following-up on human rights, labour rights, and environmental and climate aspects. This applies to both our business partners and where the policy impacts. Procedures for reporting and data collection have been established across the entire group. Parts of this reporting are included annually in the Sustainability Report.

The group reserves the right to demand sufficient information from business partners representing the group at any time to ensure that practices and principles described in this policy are implemented and applied. The group may also require our business partners to conduct a written evaluation of their compliance with this policy.

The policy has been developed with assistance from both internal and external expertise. It has been approved by the management of MT Højgaard Holding and is reviewed annually. For questions regarding the policy, inquiries can be directed to the Strategy and Sustainability department.

Søborg, November 2024