



# Data ethics policy

November 2024

## Purpose and application

The Group has a duty to report on data ethics issues. The purpose is to provide transparency in how the Group works with data and takes responsibility for data.

The data ethics policy describes MT Højgaard Holding and its subsidiaries' (hereinafter the Group) data ethics rules and the principles that apply to how the Group processes data ethically, responsibly and transparently. The policy supports and supplements the Group's corporate social responsibility policy, Code of Conduct and GDPR policy.

The target group for this policy is all employees in the Group.

## Focus areas

The Group's activities are primarily focused on construction and real estate project development. Within data ethics, the Group has the following focus areas.

### *Types of data*

The Group is increasingly processing data in line with the digital transformation. The Group's data ethics policy is therefore not limited to the processing of personal data, but in principle covers all types of data processed.

### *Principles for data ethical processing*

The Group is dedicated to being socially responsible and is committed to maturing and driving the construction industry in a responsible direction. In this context, the Group recognises that data ethics evolve alongside values in the surrounding society, which is why the principles must be continuously assessed and revised to avoid behaviour that is not in line with data ethics principles.

The guiding principles for data ethics, as described, set the ethical standard for the use of data in the Group and are based on the Charter of Fundamental Rights of the European Union.

### *Protection of information*

Human self-determination must be a priority in all data processes. In the Group's work with ethically correct data processing, the 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.

Data is processed with respect for the customer's privacy and under the protection of personal data. The Group processes personal data in accordance with our GDPR policy and only processes data that is necessary to fulfil the purpose of the processing.

The Group will always ensure the dignity of the individual by not using data brokers and not selling personal data to third parties. The Group does not use sensitive personal data ("data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade union

membership, genetic data, biometric data, health data or data concerning a natural person's sex life or sexual orientation.

The Group only uses data that is necessary, fair and legitimate in relation to the individual and in the interest of the individual, and without exposing the individual to discrimination or stigmatisation.

The Group establishes an appropriate level of security for the technologies used to process data. The security measures include technical as well as organisational measures. All employees must contribute to ensuring that security measures are met and contribute to the responsible and ethical processing of data.

## Reporting and monitoring

The day-to-day work with data ethics takes place in the Group's relevant business areas. Reporting on the Group's work on data ethics is handled by Group Legal, which reports significant risks to the Executive Board.

The policy is approved by the Executive Board of MT Højgaard Holding and is revised once a year.

Søborg, November 2024