

## STATEMENT ON NIRAS' BUSINESS INTEGRITY AND ETHICS POLICY

On behalf of all companies in The NIRAS Group we hereby declare that NIRAS has a zero-tolerance policy to corruption, tax evasion and fraud as well as to any form of modern slavery, discrimination, and harassment.

NIRAS actively contributes to combating corruption and fraud in all its forms and strives to ensure that any form of modern slavery and human trafficking as well as discrimination and harassment do not take place within NIRAS' business and supply chains. We are genuinely committed to performing and providing our services accordingly.

### NIRAS Business Integrity and Ethics Policy

This policy applies to The NIRAS Group, including all its subsidiaries, affiliates, sub-consultants, consultants, and business units.

- Every partner, organisation, company, including sub-contractors, sub-consultants or individual, with whom NIRAS signs a contract or agreement, shall having read, understood, and comply with NIRAS' Business Integrity and Ethics Policy which concerns corruption, tax evasion, fraud, modern slavery and human trafficking, discrimination, harassment, conflicts of interest, and commitment to serve clients and others with respect, excellence, and integrity.
- All NIRAS' employees are committed to providing quality services to NIRAS' clients, with value added by means of, as minimum, known best practices, while striving for new innovative methods and solutions always keeping NIRAS business integrity high.
- NIRAS' objective is to fulfil our clients' expectations and requirements by applying quality management and continuously improvement of technology, performance, and delivery through NIRAS' method of work, and with integrity as the overriding principle of behaviour.
- All NIRAS employees play a key role in ensuring NIRAS' integrity. They must perform in accordance with NIRAS' Code of Conduct, and fully understand the ethics of serving clients.
- **NIRAS has a zero-tolerance policy to corruption, fraud, and tax evasion**, and will actively contribute to combating any such illegal and unethical behaviour.

The term "corruption" is not a well-defined concept internationally. Thus, we have decided to distinguish between 7 types of what NIRAS considers as corruption:

1. Bribery & Facilitation payment
2. Fraud & Embezzlement
3. Extortion & Security payment
4. Gifts & Entertainment
5. Conflicts of Interest
6. Nepotism & Favouritism
7. Obtaining Undue Advantages

Type no. 1 and no. 2 are always illegal according to national and international law. No. 3-7 are types that potentially may become corruption, if not managed correctly.

- NIRAS has a zero-tolerance approach to any form of modern slavery and human trafficking and shall ensure that it does not take place within NIRAS' business and supply chains.
- NIRAS does not participate in projects for clients or in countries, which are officially sanctioned by the EU, the UN, the UK, USA and/ or by International Financing Institutions.
- In case of non-compliance with NIRAS' ethical standards, NIRAS will thoroughly investigate the matter and apply the full force of law, where sufficient evidence is obtained.
- All NIRAS employees should avoid situations in which there is, or may seem to be, a conflict of interest both in terms of personal interests and the interests of NIRAS.
- NIRAS acknowledges its corporate social responsibility and will actively contribute to sustainable solutions and developments that safeguard societies and the environment.
- NIRAS acknowledges its responsibility to ensure that the legal framework, in the countries where we work, is observed.
- NIRAS always pays for goods and services in a legal and transparent way and subscribes to the principle of proportionality.
- NIRAS aims for a culture where both the internal and external work environment is free of all sorts of harassment and discrimination. All employees must treat their colleagues, clients, and partners with respect, and observe the highest standards of collegiality.
- NIRAS subscribes to gender equality and diversity at workplace, and shall actively, through its employment policy and daily management, contribute to creating a conducive working environment with equal rights and opportunities for all NIRAS' employees.
- All business units and member companies of the NIRAS Group are committed to maintaining integrity, which continuously shall be monitored at group level, and improved, if need be.

On behalf of The NIRAS Group:

Lisbeth Knudsen

Chairperson, Board of Directors

Carsten T. Boesen

Chief Executive Officer

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## Carsten Toft Boesen

### Direktør

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## Lisbeth Knudsen

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