

# Code of conduct

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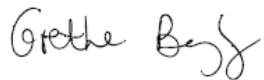


## 1.1 Message from the CEO

With over a century of history, a relentless focus on innovation, and a business culture rooted in honesty and reliability, Multiconsult has become a significant player in Northern Europe among consulting engineers, architects, and designers. Our global presence, through projects and subsidiaries, allows us to provide professional services in an increasingly complex and globalized environment. Maintaining this strong position requires trust and mutual respect from all our stakeholders.

Our commitment to the Code of Conduct is a vital component in building this trust and reflects our dedication to how we conduct business. The UN Global Compact influences our policies and thereby how we operate where applicable, while our core values remain the foundation for all our conduct and guide our interactions with clients, partners, suppliers, colleagues, and authorities.

Code of Conduct sets out the principles that underpin our business and the standards of conduct expected of all employees and representatives of Multiconsult Group. The Code has been approved by the Board of Directors and serves as the basis for our conduct, ensuring that the Multiconsult group's way of doing business promotes sustainability and upholds high ethical standards. We all share the responsibility to adhere to the principles in the Code of Conduct in every aspect of our daily work.



Grethe Bergly, Chief Executive Officer



## Guiding principles

It is an explicit expectation that all employees in the Multiconsult Group comply with the following:

- Perform his or her duties with integrity and strive to always maintain a high standard of professional accountability and performance, both within and outside Multiconsult.
- Recognise the value of a diverse workplace and respect all people. We value the fact that people from different personal, cultural and educational backgrounds offer unique skills and perspectives.
- Use common sense. If what you are doing, or are planning to do, is not something that you are comfortable talking about with your family or colleagues, it is probably unacceptable.
- Discuss dilemmas openly and report any potential breaches of this Code of Conduct.
- Allocate sufficient time when making difficult decisions. Bad decisions are often made when individuals are under time pressure.
- Are aware of potential conflict of roles or interests which may arise when Multiconsult delivers services to several parties and ensure that Multiconsult's roles are known to relevant parts internally and for our clients if there is a risk that Multiconsult's independence may be questioned.
- Ensure that his or her own actions fall well within what is permitted by legislation and this Code of Conduct. Breaches of law and of this Code constitute a threat to Multiconsult's business and the company's reputation.
- Seek advice from his or her immediate line manager and/or the Group Compliance function if in doubt as to whether any planned course of action is legal and in compliance with Multiconsult's rules and procedures.



## 1.2 Why have a Code of Conduct?

Trust is at the core of everything we do. Maintaining this trust means we must consistently behave with integrity, to establish ourselves as a reliable partner to our clients, colleagues, business associates, the communities in which we operate, and other stakeholders. Our culture is built on a foundation of integrity, which is what motivates us to do great things and always act in the right way.

Multiconsult's Code of Conduct outlines the expectations we hold for every individual who works for or with our organisation, while also highlighting our responsibilities to our employees, partners, and shareholders. There may be instances where the right course of action is not immediately clear. This is where our Code of Conduct can be a valuable resource, as it can provide guidance and direction when you're uncertain about what to do. Although it may not offer all the answers, it can point you in the right direction.

## 1.3 How can the Code of Conduct support you?

- Understand what Multiconsult expects of you.
- Give guidance to honest and ethical behaviour.
- Uphold our values and protect our reputation.
- Support you to make good decisions every day.
- Give guidance for when and how to seek guidance/support.

## 1.4 Who the Code of Conduct applies to

The code applies to all employees, both permanent and temporary employees, regardless of position. This also includes the board of directors of Multiconsult group and subsidiaries. Multiconsult expect that all affiliates and business partners conduct their business with integrity and in an ethically sound manner.

All employees, and any others subject to the Code, must read and agree to comply with the content of Multiconsult's Code of Conduct.

Anyone who works on Multiconsult's behalf, must share our commitment to business ethics and integrity by following the principles of our Code of Conduct when providing goods and services to Multiconsult, or acting on our behalf. This is done either by signing that you have read and agreed on our Code of Conduct or by signing the Business Partner Declaration.

## 1.5 Violation of laws and/or Code of Conduct

If you fail to follow applicable laws or our Code of Conduct, ignore someone else's failure to follow the Code of Conduct or pressure someone else to violate the Code of Conduct, a violation has occurred. This can harm Multiconsult's reputation.

All actual or potential violations of the law or the Code of Conduct is taken seriously. Violations may lead to disciplinary action that matches the nature and circumstances of the violation. Consequences can be a written warning, a suspension without pay, or ultimately, termination of employment. All investigated violations are documented in employee records. And if an action violates the law, it could result in fines or criminal prosecution from national authorities.

## 1.6 Values and leadership principles

Our values are part of our DNA. They give guidance to the way we work with our business partners, within our communities and with each other.

# MOVE – our values

**M**

## Motivating

- We set clear goals and expectations
- We give responsibility and encourage independence
- We provide constructive feedback
- We share knowledge as well as success stories

**O**

## Organized and trustworthy

- We only do things that we can justify, even if challenged
- We do things properly
- We focus on client-perceived quality
- We keep our promises

**V**

## Value creating

- We identify and develop commercial opportunities
- We do everything we can to add value
- We choose sustainable solutions
- We keep our eye on the big picture and work as a team

**E**

## Engaged

- We are proactive and always on the lookout for opportunities
- We are brave and not afraid to challenge ourselves and others
- We care
- We are inquisitive and always look for ways to develop ourselves

The following leadership principles applies in Multiconsult

- *Build teams:* We are stronger together than alone, and we succeed in teams. We collaborate across companies, clients and partners. We bring out the best in each other, and we always think long term and ONE Multiconsult.
- *Seek opportunities:* We explore the market and reframe the reference point for success. We actively look for possibilities to match people and solutions to develop both our business, ourselves, our clients and society.
- *Show the way:* We establish a shared understanding of where we are heading. We involve, challenge and follow up. We make priorities and lead by example, “show, don’t tell”.
- *See people:* We care, listen, set clear expectations, provide and ask for feedback. We offer trust and support. We meet everyone with respect and stay close to colleagues, clients and partners.
- *Take action:* We are proactive and active, showing courage and determination. We see mistakes as an opportunity for learning and we act on decisions.

## 1.7 Criteria for good decision making

Knowing what is right can sometimes be difficult. Use these questions as support when there is uncertainty about the correct ethical course of action. The answers will provide guidance.

- Is it legal?
- Does it feel just and honest?
- Will health or personal safety be at risk?
- Is it in line with our values (MOVE)?

- Can the action or inaction have negative consequences for the reputation of Multiconsult, our business partner or any other stakeholder?
- Does your current level of information support your action or is more information needed?
- Can you justify it publicly?
- Can the activity be perceived as fair play towards our competitors, colleagues or clients?
- Does it constitute a risk to the environment?
- Does it undermine our trust and integrity?

Please speak to your manager, local compliance officer (LCO) or group compliance officer (GCO), if you are uncertain about what the correct action might be. Multiconsult employees must report violations of the Code of Conduct, even if Multiconsult is not directly involved in the activity.

## 1.8 Laws, regulations and standards that apply

Laws and regulations can vary widely from country to country. Wherever we are located, we must know and follow the national and local laws and regulations that apply to our business and the countries where we operate. Sometimes local customs or practices can conflict with the Code of Conduct or the law. In such cases, follow the law and our Code of Conduct. If in doubt discuss with your manager, LCO or GCO.

## 1.9 Importance of reporting

If you come across a situation involving a breach of law, or a breach of Code of Conduct, talk to your manager, LCO or GCO. In addition, incidents and potential breach of Code of Conduct can be reported anonymously through Multiconsult’s Whistleblower Portal.

Multiconsult seeks to have a culture of transparency where ethical issues are understood, and actions taken can stand the test of time. Such culture provides a platform where we can learn from each other, understand the risks and develop our processes and build our organisational culture.

## 1.10 Retaliation of Whistleblowers

Multiconsult does not tolerate any form of retaliation against any person who has raised an ethical or legal concern in good faith. Acting in good faith means that the report is done in a sincere and responsible manner through any of the channels available. This applies even if the report does not turn out to be an actual violation.



## 2 Our commitment to internal stakeholders



### 2.1 Our leaders

Our leaders shall act as role models for proper business conduct. Leaders are expected to promote a positive working environment where people are treated with dignity and respect and feel comfortable raising concerns. Therefore, leaders must make an effort to create a culture:

- where employees see compliance with this Code, company requirements, and or the law, as the norm.
- that encourages discussions about legal and ethical concerns.
- where leaders acknowledge and support employees that acts with integrity and sound ethical judgement.
- where guidance about business ethical issues, based on what is stated in the Code of Conduct, is accessible.
- that ensure that employees are enrolled in ethics training.

### 2.2 Safe and secure workplace

Safety is part of our values which supports our commitment to operating ethically and with integrity, while prioritising safety and security in all that we do. We prioritise the safety and security of our employees, our physical assets and the environment in which we operate. Health and safety are a shared responsibility of every Multiconsult employee. Each of us have a moral and legal responsibility to comply with all applicable laws, regulations and standards, as well as our own internal requirements, related to health and safety aspects of the work we perform and the facilities we control.

A safe and secure work environment is one that is also free from violence. Threatening behaviour is not acceptable.

If witnessing or receiving a threat or act of violence, report it in accordance with chapter 1.9.

## 2.3 Drugs and Alcohol

The use of drugs and alcohol can have a detrimental impact on your decision-making abilities and can impede the capacity to carry out our work in a safe manner. It is strictly prohibited to work while under the influence of drugs or alcohol, including the misuse of prescription medication that may compromise your ability to perform at your best.

While alcohol may be served at company social events, it is expected that consumption should be kept to a moderate level.

When working on behalf of Multiconsult, it is imperative that representatives refrain from using or encouraging others to use alcohol or illicit substances in a way that could endanger their health and safety, or that could harm or damage the reputation of Multiconsult or its business partners.

## 2.4 Mutual respect

Multiconsult is committed to fostering a workplace where we are all treated with dignity and respect. We value diversity amongst our employees. Multiconsult does not tolerate discrimination or harassment. We all have the responsibility to treat all parties involved in all our activities, internally and externally, with respect and in a fair, non-discriminatory nor non-harassing manner.

Multiconsult offers equal employment opportunities for all. This gives each of us equal consideration for employment, regardless of background. Multiconsult makes all decisions regarding recruitment, hiring, training, and organisational changes based on merit, and never on any traits\*. Maintaining a respectful workplace is linked to our or others perception of the activity that is being conducted\*\*.

While we expect the Code of Conduct to be followed, we also recognise your rights as a Multiconsult employee. For example, the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment. The content of this Code of Conduct or any Multiconsult governing documents are not intended to limit or interfere with your rights under the law.

\*Traits can be, but not limited, to age, ancestry, colour, gender, medical condition, national origin, physical or mental disability, race, religion or sexual orientation.

\*\*Harassing conduct can be any of the following: a) verbal remarks (comments, suggestions, jokes that can be perceived offensive), b) graphic material (drawings, photographs or videos), c) physical behaviour (violence, acting or touching).

## 2.5 Protecting assets and privacy

Multiconsult conduct business by acquiring and developing physical and intangible assets, and it is our responsibility to safeguard these assets against loss, damage, misuse, and theft. Our intangible assets, including our reputation, know-how, and goodwill, are equally important to protect. These assets also encompass confidential information of various levels, such as business plans, intellectual property, proposals, technical innovations, designs, inventions, patents, financial information, governing documents, client lists, and other proprietary information we generate as part of our work for Multiconsult.

Under no circumstances should we reveal Multiconsult's confidential information to outside parties unless we are authorized or legally obligated to do so. Furthermore, we should not disclose such information to colleagues who do not have a legitimate business need to know it. If and when sharing this information with a colleague or third party is necessary, a non-disclosure agreement (NDA) must be in place. Confidential information belonging to Multiconsult must not be disseminated, even after an employee's departure.

We have a duty to protect the privacy of our employees in accordance with applicable legal requirements. All personal data, including employee assessments, benefits, and salary, must be handled with care and only by authorized employees. If discovering or suspecting unauthorised use or disclosure of confidential information, a notification in accordance with chapter 1.9 should be done.

## 2.6 Computer resources and Social Media

Multiconsult's computer resources for communication, accessing and storage must be used responsibly and securely. These resources are provided for business purposes. The following, limitations apply:

- Personal use of Multiconsult's internet, email system and other information technology resources should be kept to a minimum.
- Communication of inappropriate\* or offensive content, along with viewing or sharing is a violation of this Code.
- Downloading or use of unlicensed or illegal material.
- Multiconsult systems should not be used for storage of files that you intend to keep private.

All information, data and other content on Multiconsult's systems and infrastructure is company property. Multiconsult reserves the right to monitor activity, data and files on our systems/ resources/ access and use with-out prior notice.

Social media\*\*\* is a unique opportunity to spread and discuss information and other material. These resources are accessible through Multiconsult IT infrastructure, and one should keep in mind that electronic communication can be altered without our consent, and can affect Multiconsult's reputation, if misused. Therefore, we expect that Multiconsult employees adhere to this Code and relevant policies and procedures, when using social media and never speak or act on Multiconsult's behalf unless authorised to do so.

\* Under inappropriate or offensive falls abusive, harassing, threatening and discriminatory language

\*\* Examples of social media include, but are not limited to; Twitter®, Facebook®, LinkedIn®, TikTok® etc.

### 3 Our commitment to external stakeholders



#### 3.1 Gifts, hospitality and entertainment

We place great value on the positive and ethical relationships we have established with our clients, suppliers, and other stakeholders. To maintain these relationships, it is imperative that they are not influenced by inappropriate gifts or hospitality.

Historically, gifts and entertainment have been customary ways to express gratitude and cultivate connections in business. However, when these gestures become excessively generous, they can create a sense of obligation or indebtedness in the recipient, which may compromise their objectivity or be perceived as a conflict of interest. At Multiconsult, the policy is clear: we do not exchange gifts, hospitality or entertainment that could be seen as an attempt to improperly influence others. Whether giving or receiving a gift, it is important to recognise when an offer is excessive. This can be challenging, as laws and customs vary significantly within and between countries.

#### 3.2 What level of gifts, meals and entertainment is acceptable?

On a general level, all gifts, hospitality and entertainment that will be perceived as “moderate” \* are acceptable. If receiving or being invited to, something that exceeds the “moderate” limitations it should be discussed with your manager, LCO or GCO for approval. We recognise that sharing meals and entertainment is common in business, so acceptance of occasional invitations from clients, suppliers\*\* and other business partners, is acceptable if they also attend, and the costs are reasonable and customary.

If there is a good business reason for accepting an invitation, Multiconsult should at a minimum pay for key expenses\*\*\* linked to the invitation.

\* When receiving something moderate, moderate indicates that it does not matter to the recipient whether he/she receive/participate or not.

\*\* Invitations/gifts and entertainment offers from potential suppliers requires more scrutiny before a decision to accept/ reject is taken

\*\*\* Travel cost and accommodation.

## 3.3 Not offending the giver

Sometimes it can be difficult to refuse a gift, especially if this might insult the giver or if the gift was handed over in front of a group. If you cannot decline the gift, accept it, but immediately notify your manager or LCO, who will work with you to donate, distribute or raffle it among a larger group of your colleagues.

## 3.4 Offering or receiving payments

Multiconsult expect that all employees act ethically in all our business dealings. Such behaviour is prerequisite to foster long-term working relationships with our business partners, communities and governments wherever we operate throughout the world.

We never give, offer or accept improper payments in any form. National laws and international standards are clear on this issue, i.e. it is illegal to give, receive, offer or solicit bribes, kickbacks or other types of improper payments to government officials or to employees in the private sector.

Anything of value given in an attempt to influence an official's actions or decisions, or to private sector employees, to obtain or retain business or achieve some type of advantage is defined as a bribe. Vice versa, accepting anything of value that influence our actions or decisions is a violation of this Code. Using business partners to engage in activities that are a violation of this Code is also not acceptable.

Multiconsult does not accept use of facilitation payments. If a facilitation payment has been issued to prevent immediate harm to employees, or in cases of clear and present danger, such activity must be reported immediately to LCO or GCO, either directly or through the Whistleblower portal.

Consequences for violation of corruption laws are severe. Due to their complexity, all Multiconsult employee should consult with LCO or GCO before anything of value is being offered to, or accepted from, public officials or employees of private sector companies.

## 3.5 Conflicts of interest

A conflict of interest arises when our private interests unjustly impede the interests of Multiconsult or any other stakeholders. To prevent such conflicts (or even the appearance of conflicts), we must assess any external business or volunteer engagements that may potentially interfere with Multiconsult's interests. It is crucial to note that even if an activity seems unrelated to our role, we might need to obtain pre-approval before engaging in it.

We must avoid ownership and other financial interests in companies outside of Multiconsult that could lead to potential conflicts of interest. We prohibit ownership in companies\* that directly compete with Multiconsult. Employees are not permitted to hold positions in companies outside of Multiconsult, nor perform other paid work without written permission from manager above, LCO or GCO.

Additionally, personal gain and/or advantage must never take precedence over obligations to Multiconsult. We strictly prohibit the use of our position, or any attempts to use it, to obtain improper personal benefits, such as loans, guarantees of obligations, or gifts from any person or entity. This policy also applies to family members or any other individual or group.

If aware of a transaction or relationship that could reasonably be expected to give rise to a conflict of interest or perceived conflict of interest, the issue should promptly be discussed with manager, LCO or GCO.

\* Does only apply to companies not listed on stock exchanges

## 3.6 Favouritism of close relations (Nepotism)

Nepotism at the workplace consists of displaying favouritism towards family members, relatives and close friends. Nepotism is not tolerated, and we shall never use our positions to help our families and friends obtain advantages at the expense of Multiconsult. If we are aware that a family member or close friend is party to a potential contract, tender or offer involving Multiconsult, we should

immediately inform our manager, LCO or GCO whom will assess if there is a conflict of interest, and our employee should withdraw from the process.

In order to avoid nepotism and potential conflict of interest within the company, employees with a close relationship to one another shall not work in the same line management chain. If a personal relationship develops between employees in the same line management chain, the issue shall be discussed with the managers, LCO or GCO so that an appropriate solution can be found. Employing family members of other employees is not considered nepotism, if recruitment procedures of the company have been followed. Employees cannot participate in the recruitment and employment processes of their own friends and relatives.

## 3.7 Providing quality products and services

Multiconsult relies on quality in the services and products we deliver to our clients. In order to do this consistently, we must comply with national and international laws, regulations and standards, in addition to the contract specification and our governing documents that regulate our deliveries to our clients.

All employees are required to familiarise themselves with what is required by Multiconsult, the client and other relevant stakeholders. Multiconsult's policies and procedures are developed to protect the quality of what we deliver internally and externally.

Multiconsult is dependent on suppliers, contractors, consultants and other business partners. These parties can be key in our supply chain, and we therefore take great care in selecting them. All external partners must meet or exceed our high standards of ethical business conduct. If suspecting any non-conformance please contact your manager, or the manager above.

If it involves unethical business practice, please involve LCO, GCO or report it through the Whistleblower Portal.

## 3.8 Financial Integrity and inside information

In the event that we possess knowledge of confidential information that has not been made public and is obtained through our employment, it is unlawful to engage in buying or selling shares unless the transaction has been pre-approved at the appropriate level, as stipulated by the law. This applies to both Multiconsult shares and those of our business partners. Additionally, it is illegal to disclose such information to individuals who are not authorized to access it, as mandated by the law.

If discovering or suspecting such activity, a notification in accordance with chapter 1.9 should be done.

## 3.9 Sponsorship

Multiconsult is entitled to various rights and benefits in exchange for being a sponsor. These may include the use of the sponsored organisation's name, advertising credits, and access to facilities or opportunities to promote Multiconsult's name, products, and services. When selecting sponsoring activities, we prioritise opportunities that align with our business and values. These activities should directly relate to our business, the sectors we work in, our sustainability agenda, and other business-oriented topics like public relations and human resources.

- We avoid using sponsorships in situations where we might have or appear to have undue influence over someone.
- We will not pursue any sponsorships that could create the perception of impropriety in relation to business opportunities.
- We are careful when selecting sponsorship activities, ensuring that the sponsored parties and Multiconsult have similar values.
- We understand that sponsorships entail a degree of risk such as the perception of bribery.

- We ensure that we never offer a sponsorship as an incentive or reward for obtaining or retaining business, or for any other improper purpose.

## 3.10 Political and charitable contributions

Multiconsult supports employees' own initiatives in political and charitable activities. However, this must always be carried out during spare time and at the employee's own expense. Multiconsult must never be attributed for such activities conducted during spare time, such as campaign work, fundraising or speech making. Similarly, the employees may never use Multiconsult's resources (such as funds, facilities or supplies) in connection with personal political or charitable activities and should never expect Multiconsult to reimburse for any political contributions or other expenses. If uncertain, please discuss with manager or LCO before any activities are conducted that might involve Multiconsult's resources.

## 4 Our commitments to society as a whole



### 4.1 Anti-Corruption Principles

We always adhere to the highest ethical standards and avoid any involvement in corrupt activities, whether by personally engaging in, authorising or tolerating them. We, furthermore, never offer or accept an improper advantage, which is an advantage that serves no legitimate business purpose and is offered with the intention of influencing the recipient's decision-making process.

However, if forced to make a payment due to threats to life, health, safety, or illegal detention, no retaliation will be enforced. Such payments must be reported to LCO or GCO immediately.

It is crucial to conduct proper due diligence on all business partners and ensure that we do not engage others to perform tasks that we are not ethically or legally allowed to do ourselves.

### 4.2 Obtaining business with integrity

Obtaining business involves communication with clients, suppliers and other relevant stakeholders. We must make sure to be honest and accurate when communicating and discussing our capabilities, credentials, qualifications and corporate history, either verbally or in writing. Equally, we do not discredit our competitors or use unfair practices against competitors.

We neither directly nor indirectly attempt to take the place of another consulting engineer or architect, already appointed for a specific work. We do not take over the work of another consulting engineer or architect before notifying the consulting engineer or architect in question, and without being advised in writing by the client of the termination of the prior appointment for that work.

### 4.3 Ethical collection and use of information

Our competitive advantage is obtained through excellent performance of our services, Multiconsult is, like the rest of the market, monitoring the market and its players. All information gathered is publicly available information. Even though Multiconsult employs employees with backgrounds from public and



private sector, no employees are pressured to breach confidentiality agreements, to reveal confidential information about previous employers.

Multiconsult does not gather information about our competitors through deceptive or misleading actions. If confidential information about a competitor is deliberately or inadvertently disclosed to you, discuss the issue with your manager, LCO or GCO before any further actions.

## 4.4 Ethical business conduct

Multiconsult is proud of the work we do globally. We believe that our ability to continue to foster good working relationships is built on acting ethically. A “bribe” is anything of value\* given in an attempt to influence an external party’s actions or decisions, obtain or retain business, or acquire any sort of improper advantage. We never offer or accept a “kickback,” which is the return of a sum already paid (or due to be paid) as a reward for making or fostering business arrangements. We will not retain any third-party engagement, enter into a joint venture or any other business association that involves any activity that we ourselves are prohibited from participating in.

\* Anything of value could be anything from gifts, money, tickets, invitations to events, discounts etc.

## 4.5 Competition law

Our clients expect fair competition and because Multiconsult is competing based on the quality of our products and services, we are committed to always promoting fair competition. We must never engage in, or support, unfair or predatory business practices or any activities that would improperly restrain trade. Similarly, it is critical that we abstain from any activity that may violate or give the appearance of violating competition laws. While competition laws vary between the different countries where we conduct business, these types of conduct are prohibited:

- Agreeing on the prices, terms or conditions of sale for competition services or products.

- Dividing or allocating clients, bids, markets or territories for completing services or products.
- Agreeing to refuse to do business with in particular third parties (exclusivity agreements).

These rules apply to informal understandings as well as to formal agreements. To make sure that we are competing fairly, we should refrain from discussing any of these activities with our competitors, or from discussing any other matters that could be seen as an attempt to limit competition. Behaviour that violates these rules should be reported.

## 4.6 Sustainability

The projects Multiconsult is part of, and decisions taken based on recommendations from us as consultants, has an impact both local and global in relation to sustainable development. As an international company we comply with all environmental laws, rules and regulations where we conduct business, set bold ambitions in environmental stewardship, and look to support our clients in exceeding laws, regulations and standards whenever possible.

We constantly strive to maximise the efficient use of natural resources, lower our carbon emissions and reduce our overall environmental footprint when we conduct our business.

## 4.7 Human rights

Multiconsult seek to conduct our business in a manner that respects the human rights and dignity of people. Each of us can play a role in the elimination of human rights abuses such as child labour, human trafficking and forced labour. Our aim is to promote human rights within the communities where we operate. We expect all employees, business partners and suppliers to avoid causing or contributing to human rights infringements through their activities.

Multiconsult has made commitment to respecting internationally recognised human rights throughout our own operations, as well as in our supply chain. We

support the principles of the United Nations Global Compact, and we support the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, and the core conventions of the International Labour Organisation (ILO). We publicly display our progress on improvements in human rights by reporting according to the European Sustainability Reporting Standards (ESRS).

## 4.8 External communication

Providing our external stakeholders with an accurate picture of our operations, transactions and intentions helps us to preserve Multiconsult's integrity. In order to do this, we make sure that we speak with one consistent voice. Therefore, only those who have been approved to serve as a Multiconsult spokesperson should make public statements about Multiconsult.

## 4.9 Money laundering

Financial transactions in which criminals, including terrorist organisations, attempt to disguise the proceeds, sources or nature of their illicit activities is prohibited by law. Multiconsult is committed to help in the global fight against money laundering. Therefore, we should always perform due diligence on clients, suppliers, intermediaries and other business partners who wish to conduct business with Multiconsult.

## 4.10 Sanctions

Multiconsult is committed to adhering to all applicable sanction's laws and regulations. Sanctions are legal restrictions imposed by governments or international bodies on specific countries, entities, or individuals. We must ensure that our business activities do not violate these restrictions, as this could lead to severe legal consequences and damage to our reputation. Evading or

attempting to circumvent sanctions, including indirect dealings through intermediaries, is strictly prohibited.

All opportunities and collaborations with new partners must undergo due diligence to ensure compliance with sanctions. If you suspect that any transaction or partner may be subject to sanctions, consult with your manager, Local Compliance Officer (LCO), or Group Compliance Officer (GCO).