

MT Højgaard wishes to develop its position as Denmark's leading contractor and it is, therefore, of importance for us to manage our activities as a responsible and trustworthy company. MT Højgaard wishes to be perceived as a client-oriented, value-creating, innovative company and a company with a sound financial base. Applying these core values, we wish to dissociate ourselves from corruption, bribery and other inappropriate business practices. We consequently set high demands to our own conduct and we also wish to influence our business partners to respect principles of good business ethics. The purpose of this Code of Conduct is to ensure that suppliers to MT Højgaard operate in accordance with internationally recognised minimum standards on human rights, labour and environment.

General requirements

The principles as set forth in this Code of Conduct provide the minimum standards expected of suppliers to MT Højgaard. MT Højgaard recognises that reaching the standards established in this Code of Conduct is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions. Suppliers to MT Højgaard must also meet certain demands regarding quality, health, safety and environment (QHSE). These requirements will be advised separately to suppliers.

MT Højgaard expects that these principles as expressed in this Code of Conduct apply to suppliers, parent entities and subsidiary or affiliate entities, as well as all others with whom they do business including employees, subcontractors, sub-suppliers and other third-parties. MT Højgaard expects that suppliers ensure that this Code of Conduct is communicated to the employees and subcontractors of all suppliers, and that it is done in the local language and in a manner that is understood by all.

It is the expectation of MT Højgaard that suppliers, at a minimum, have established clear goals toward meeting the standards as set forth in this Code of Conduct. MT Højgaard may monitor that management systems etc. have been put in place to ensure that the principles set out in this Code of Conduct have been met, and failure to do so may impact the future prospects of a supplier to do business with MT Højgaard. MT Højgaard or a third party assigned by MT Højgaard may conduct reviews or onsite audits of its supplier's facilities and those of their subcontractors to assess the supplier's progress towards the principles as set out in this Code of Conduct.

It should be noticed that all principles contained in this Code of Conduct are of equal importance independently of their order of appearance.

Conflicts between the provisions of this Code of Conduct and national laws or other applicable standards will be evaluated by MT Højgaard in cooperation with the supplier. Suppliers must be able to prove their compliance with this Code of Conduct, and if any conflicts are detected, the supplier must inform MT Højgaard immediately. In the event of non-compliance, MT Højgaard will require the supplier to be committed and engaged in remedying the non-compliance issues within a time schedule as set out in written by MT Højgaard.

MT Højgaard is naturally committed to assist and continuously improve principles of good business ethics together with our suppliers and help them achieve compliance with the provisions of this Code of Conduct. However, MT Højgaard also reserves the right to terminate any agreements should a supplier decide that compliance with the requirements of the Code of Conduct is impossible to obtain, in case of a fundamental breach of the Code of Conduct or that the supplier shows repeated disregard for the Code of Conduct.

Specific requirements

Child labour and young workers

a. Minimum age requirements

The supplier shall not engage in, or benefit from, the use of child labour. The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years (or 14 years where established national laws in accordance with the ILO developing country exception).

b. Educational remediation programme

If the supplier becomes aware that it is employing children of school age, it shall ensure that the children are enrolled in a remediation programme, rather than being summarily terminated from employment. The programme shall include access to education and financial support and shall be decided in consultation with the child and family or guardians.

c. Light work and apprenticeship programmes

Where permitted by national laws, the supplier may employ children between 12 and 15 to perform a few hours of light work per day. The work must be simple tasks of a limited nature and not interfere with the children's educational responsibilities. Apprenticeship programmes for children below the minimum age of employment must be remunerated and clearly aimed at training.

d. Hazardous and harmful work

The supplier shall refrain from hiring young workers (below 18 years of age) to perform any type of work, which is likely to jeopardise their health, safety or morals.

Forced labour

a. Forced labour and freedom of movement

The supplier must not participate in, or benefit from, any form of forced labour, including bonded labour, forced prison labour, slavery, servitude, or human trafficking. Workers must have the freedom of movement during the course of their employment.

b. Retention of identity cards and travel documents

The supplier shall refrain from retaining the identity cards, travel documents, and other important personal papers of its employees.

Non-discrimination

The supplier shall not engage in or support discrimination on the basis of race, colour, sex, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, family responsibilities, age, and disability or other distinguishing characteristics. The supplier's employees must not be exposed to any physical punishment, threats of violence or physical, sexual, psychological or verbal harassment or maltreatment in the work place or work related situations. Hiring, remuneration, benefits, training, advancement, discipline, termination, retirement or any other employment related decisions shall be based on relevant and objective criteria.

Freedom of association

a. The right to organise and collective bargaining

The supplier must recognise their employee's right to choose whether or not to associate with or establish any organisation including labour organisations.

b. National or regional prohibition of trade unions

If trade unions are not allowed in the area of operation, or only state authorised organisations are allowed, the supplier shall facilitate, and not prevent, alternative legal measures to allow employees to gather independently to discuss work-related matters and a forum to present work-related concerns to management.

Occupational health and safety

a. Health and safety standards

The supplier shall ensure that its workers are offered a safe and healthy working environment, including, but not limited to, protection from fire, accidents and toxic substances. Adequate health and safety policies and procedures must be established and followed.

b. Training and protective gear

The supplier shall provide its employees with the protective equipment and training necessary to perform their tasks safely.

Conditions of employment and work

a. Minimum wages

The supplier shall compensate its employees in accordance with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Any disciplinary wage deductions are to conform to local law. The basis on which workers are being paid is to be clearly conveyed to them in a timely manner. Deductions from employees' wages by the supplier as a disciplinary measure, or any other deductions not required by law, shall not be permitted. All disciplinary measures should be recorded.

b. Working hours

The supplier shall ensure that work weeks are not to exceed the maximum set by local law. Further, a work week should not be more than 48 hours per week, including overtime, except in emergency or unusual situations. Employees should be allowed at least one day off per seven-day week.

c. Employee privacy

The supplier shall respect the privacy rights of its employees whenever it gathers or keeps private information or implements employee-monitoring practices.

Accidents and health

a. Industrial accidents and health emergencies

The supplier shall establish and maintain emergency procedures to effectively prevent and address all health emergencies and industrial accidents affecting the surrounding community.

Environmental protection

a. Legal compliance

The supplier must comply with all relevant host country environmental legislation. The supplier must maintain awareness of current environmental legislative requirements, relevant to the environmental impacts of its activities, products and services and ensure legal compliance through training, awareness, operational control and monitoring.

b. Management of environmental issues

The supplier must work systematically to prevent, minimise and remedy adverse environmental impacts of its activities, products and services through a proactive approach and responsible management of its environmental aspects. The supplier must demonstrate continuous improvements of the overall environmental performance related to significant environmental aspects.

Business ethics concerning corruption in all its forms, including extortion and bribery

a. Standard of moral

The supplier shall adhere to the highest standard of moral and ethical conduct, respect local laws and not engage in any form of corrupt practices, including extortion, fraud, or bribery, at a minimum.

b. Improper business behaviour

The supplier is expected not to give or receive improper benefits or benefits that may be regarded as improper remuneration in order to obtain, retain or direct business or in order to secure any other improper advantage in the supplier's business with MT Højgaard. Such improper benefits (bribes etc.) may comprise cash, items, pleasure trips or services of another nature.