

To whom it may concern

Elaboration on how NIRAS' complies with the principles of Safeguarding

NIRAS is committed to excellence in improving social and environmental safeguarding for our clients and through all our commitments. Simultaneously, we support the sustainable development of the society and balanced life for our employees.

The issue on safeguarding and the importance of compliance pervade all NIRAS' activities. Before entering into contracts and agreements, we screen projects for issues related in particular to corruption and human rights. NIRAS has committed to advance the ten principles of **United Nations Global Compact** within its sphere of influence (re. the Global Compact Certificate) as a guidance of our work and to avoid doing harm or allowing any kind of discrimination in any stage of our operations.

Our safeguarding principles are divided into four main pillars:



All NIRAS staff as well as all other personnel involved in NIRAS' projects and programmes are committed to comply with NIRAS' Business Integrity and Ethics Policy, which among other things, stipulates the importance and obligations for all NIRAS' staff and partners etc. to:

- Respect **human rights** in all projects and programmes implemented
- **Avoid any kind of discrimination** in all stages of NIRAS operations
- **Provide environmentally, socially and economically sustainable services** in the sphere of our impact.
- Serve and treat all clients partners, personnel etc. with **respect, excellence and integrity**.

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It is thus compulsory that every partner, organisation, company or individual, with whom NIRAS signs a contract or agreement, shall having read, understood and comply with NIRAS' Business Integrity and Ethics Policy that concern 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.

Human rights

We base our work on a human rights based perspective where equality, non-discrimination, participation, and transparency guide our work. We fully subscribe to all international conventions on human rights and principles on labour and ethical employment, such as the International Labour Organisation standards on labour and social matters and UN's Universal Declaration of Human Rights. In cooperation with development partners we design our projects and programmes using a "human rights lens" and, with it, a set of intricate rights-based tools. We ensure that we mainstream rights issues into the design and implementation of our programmes as a mean to promote rights-based outcomes.

In 2017, NIRAS issued a statement on "Modern Slavery and Human trafficking" in particular in regards to Article 3: Everyone has the right to life, liberty and security of person, Article 4: No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms and Article 5: No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment. The statement necessitate our staff and board of directors to respect the content of the declaration and work against slavery and human trafficking.

NIRAS is engaged to promote child protection. Projects are investigated to minimise negative impacts on children, any implications on using child labour or decrease school attendance are not supported. Many of the countries where our services take place, girls are having less opportunities than boys. Therefore as part of our projects we are fostering the opportunities for girls and striving for equal gender balance internally as well as among our beneficiaries by general goal of equal gender distribution.

Discrimination

NIRAS is committed to promote equal rights and opportunities in its internal processes as well as in external operations. Any sort of discrimination is not accepted. We recognize the higher risk of discrimination among most vulnerable groups including women, children, people with disabilities, indigenous groups, migrant workers and older people and are committed to work on protecting them from discrimination.

NIRAS' has separate Gender Equality and Diversity Plan to ensure to promote and remove obstacles to equal rights and opportunities in the workplace and in our services. It provides measures for ensuring that all present and future employees as well as beneficiary communities are given equal rights, and are protected from discrimination.

The Gender Equality and Diversity actions listed below covers nine grounds for discrimination:

- i. **Working conditions:** NIRAS is committed to putting measures to ensure that both the physical and psychosocial work environment is suitable for everyone regardless of age and gender.
- ii. Providing measures that encourage combining employment and **parenthood** by adapting responsibilities at work according to various stages of personal life. NIRAS sets payments individually on an objective

- basis. This means, amongst other things, that parental leave must not have a negative effect on the wage set for the employee.
- iii. Measures against **harassment**: NIRAS is against conduct which insults the dignity of the individual and which is associated with gender, ethnic affiliation, religion, sexual preference or functional disability.
 - iv. Training and other **skills development**: NIRAS provides equal opportunities, gender equality, and ethnic diversity. Everyone shall have the same opportunities in the company, the recruitment, and promotion processes.
 - v. Provisions and practice on **salaries and other terms of employment**: Salaries and terms of employment at NIRAS shall be based on gender equality and set on the basis of expertise and experience.
 - vi. **Recruitment and promotion**: To achieve an equal gender distribution and increased diversity on recruitment and promotion to senior posts.
 - vii. Promote an **equal gender distribution**: NIRAS goal is to have equal gender distribution at company level and business area level.
 - viii. **Displacement** of individuals, groups and communities; NIRAS is respecting the individual will and dialogue between persons, groups and communities and working on preventing the forcible displacement of any individual.
 - ix. **Access** to goods and services: as a part of our development services we acknowledge different levels of incomes and work to enable the poor to gain access to goods and services,0 in a sphere of our impact, that they otherwise could not afford

Working in NIRAS means actively addressing issues of discrimination and inequality in our daily work at the work place and beyond. NIRAS has introduced an online training to raise awareness and provide tools to combat discrimination, racism and harassment in the work place. The training Workplace Diversity is available here <https://niras.sharepoint.com/sites/NIRASLMS365/SitePages/Digitalonboardingver.2.aspx> (internal link).

Environment

NIRAS environmental safeguarding is conducted for several purposes; ensuring a safe and healthy work environment as well as a safe and healthy natural environment for the future.

Health and safety

It is the policy of NIRAS to perform all activities in such a way that occupational health and safety are secured in the best way. NIRAS puts strong emphasis on being a safe and healthy workplace or contractor, with good job satisfaction. Therefore, we have a separate health and safety policy with all details for ensuring the NIRAS wide security. The NIRAS' health and safety policies and systems are specified for internal and external work environments (see more details in document for NIRAS' health and safety policies and systems).

For external working environment our policy states that:

- Activities related to NIRAS' projects must be planned and implemented such that people's health, safety and welfare are protected to a level at least equivalent to the legal requirements and guidelines. Additional health and safety requirements shall be agreed with the client before being implemented.
- All legislation and authority requirements shall be respected.
- "Best knowledge and practices" must be included when implementing the planned working environment activities.

The same principles apply for the internal working environment, ensuring personal development aspects. The NIRAS Quality Director is responsible for updating and

communicating the Health and Safety policy on the Intranet and each office manager, project manager, and employee is responsible for applying the prescribed Health and Safety policy.

Environmental sustainability

NIRAS drives for providing sustainable services. Therefore we have put effort for keeping our services environmentally sustainable as well as our internal actions. Our environmental accountability includes, for instance, reporting on GHG-emissions caused by NIRAS A/S following the GHG Protocol Corporate Standard, including monitoring and reduction of direct and indirect GHG emissions. Reduction actions have included production of solar energy and collecting food waste to produce electricity and heat. For reducing our carbon footprint caused by travelling we are minimizing the amount of travelling needed for projects and favor the use of video conference systems when possible. In addition, we utilize our presence in 22 country offices which allows us to optimize the need for single travel from other countries. The ways for reduction of our own carbon footprint and promoting more sustainable environments are constantly under development and new opportunities are screened out for finding the best solutions.

As a part of our services we are analyzing the risks for to the economic livelihood of local communities and working on protecting those as a part of development.

NIRAS' Compliance Unit (NCU)

NIRAS group of companies has established a Compliance Unit. It consists of compliance officer(s) and support staff is responsible for the coordination, maintenance, filing of documentation and overseeing of compliance. The Compliance Unit also provides training and guidance of NIRAS' staff, including NIRAS' management, on integrity and ethical issues at large and NIRAS' Integrity Management System in particular.

NIRAS has developed an on-line anti-corruption course, which includes a test and a certificate for satisfactory completion of the course. All project staff are mandatory participants.

Compliance in NIRAS' terms means respecting and adhering to local laws and regulations e.g. tax laws and all payments being made in a transparent way. NIRAS does not overpay for services and only pays for services rendered upon proof of work done and to bank accounts named in the Consultant's or Company's name and in their respective countries of registration.

The Compliance Unit can be contacted by all working for NIRAS; employees, project based staff or affiliates on issues such as:

- Corruption – see further statement on corruption and NIRAS Integrity Management system.
- NIRAS Whistleblowing arrangements

Harassment – bullying, sexual or any issue in this regard is the responsibility of HR and follows the NIRAS HR guidelines:

<https://niras.sharepoint.com/sites/GlobalHR/SitePages/Working-climate-and-job-satisfaction.aspx> (internal link). Complaints and other related contact can be delivered anonymously if so required to this HR mailbox harassment@niras.dk. The NCU will only be involved if directly asked or if engaged via the whistleblowing arrangement.

Statements etc.

Statements on NIRAS' Environmental and Climate Policy, and on NIRAS' Occupational Health and Safety Management are appended (Appendix 1 and 2) to the present elaboration document.

NIRAS Gruppen A/S
Claus Jørgensen
International Market and Compliance Director

Appendix 1

NIRAS's environmental and climate change policy

Policy

Environmental and climate change

To whom it may concern

Date: 14 September 2021

NIRAS's environmental and climate change policy

Our knowledge and awareness of the global environmental and climate challenges demand that we take action. It is NIRAS's policy to perform all our activities in a manner that supports the environment and mitigates climate change.

NIRAS's own impact on the environment and climate is high on our agenda and we take ongoing action to reduce negative impacts. NIRAS follow the UN Global Compact and Federation of Consulting Engineers' (FIDIC) recommendations regarding environmental and sustainable development in our operations.

On NIRAS projects:

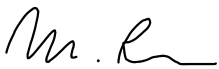
In NIRAS we recognise our responsibility in relation to climate change, the environment, and our community in the approach to our services and the way we conduct business. As a consequence, projects are planned and carried out in a manner that keep impacts to the surrounding environment and climate at a minimum.

We maintain an open dialogue with our Clients and stakeholders and seek long-term sustainable solutions that not only solve technical challenges but are in harmony with the surroundings, and are beneficial to the climate as well as the environment.

When carrying out planned environmental and climate change efforts, we leverage the expertise of NIRAS's technical networks to apply "best knowledge and practices".

Yours faithfully

NIRAS A/S



Merete Reeves
Quality and Risk Director

Appendix 2

NIRAS's Occupational Health and Safety Management policy

Policy

Occupational Health and Safety Management

To whom it may concern

Date: 14 September 2021

NIRAS's Occupational Health and Safety Management Policy

It is NIRAS's policy to perform all activities in such a manner that individuals' health, safety, and well-being are ensured in the best way possible.

In NIRAS we take pride in providing a safe and healthy work place with high employee satisfaction. In NIRAS we operate according to national occupational health and safety rules and regulations.

On NIRAS' projects:

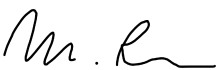
As part of tendering, planning and design, we take into consideration any health, safety and work environmental-related issues that may arise during a project's execution phase or later during operation, maintenance or decommissioning in accordance with the rules and statutory orders in force.

For projects with identified risks related to occupational health and safety, we present the Client with the option of working in detail with improvements to the working environment and how we may assist in mapping and introducing measures to minimise potential work-related impacts during the project's execution, operation, maintenance, and decommissioning.

When carrying out planned occupational health and safety efforts, we leverage the expertise of NIRAS's technical networks to apply "best knowledge and practices".

Yours faithfully

NIRAS A/S



Merete Reeves
Quality and Risk Director