

# Code of Conduct

## 1. Area of Application

At EnviDan we expect that all employees will:

- comply with national legislation
- comply and act in accordance with EnviDan's Code of Conduct
- make suppliers familiar with EnviDan's Code of Conduct

Employees in EnviDan are:

- all employees in the [EnviDan Group](#)

Suppliers are:

- suppliers in a project-related context

## 2. Introduction

At EnviDan we place great demands on ourselves, our approach to doing business and our ability to take a shared responsibility. Due to a lack of legislation and differing cultures we know however that, on an international level in particular, we can face problems and challenges that cannot be resolved from one day to the next: that different parts of the world have different views on the environment, people and living conditions and thus also different values, wishes and needs.

EnviDan's Code of Conduct is thus our management tool, which helps us to identify specific as well as potentially negative social, environmental and economic influences in the work-related partnerships we enter into, and in the projects we take on for our customers. Our Code of Conduct raises our awareness and forms the basis for both improvements and corrective and preventative action in our own value chain as well as in our collaborative partners.

In order to ensure that we at EnviDan act in accordance with internationally recognised principles, EnviDan's Code of Conduct is, among other things, based upon the UN's Declaration of Human Rights, a number of ILO conventions on the rights of workers, Agenda 21 and the UN's Convention against Corruption.

Furthermore, EnviDan supports the UN's 17 global goals for sustainable development, and at EnviDan we actively work to ensure that the global goals are incorporated into our collaborations and project solutions, so that these become a natural part of our everyday work and our solutions.

## 3. Consequences

We know that we can meet resistance, particularly internationally, as well as violations of our Code of Conduct due to a lack of legislation, other cultures and differing knowledge and understanding. We do not take up our responsibilities by turning our backs and breaking off the collaboration when problems arise, but rather work through building relations with employees and collaborative partners – relations, where respect and understanding for each other and other cultures, an exchange of knowledge and a continual development and improvement of the collaboration are central.

We therefore strive to continually develop our employees' and collaborative partners' awareness of and behaviour in taking into account people, the environment and economics in our project management.

In especially grievous cases and in the event of a lack of progress in the collaboration, EnviDan may terminate the collaboration immediately. This will also apply should EnviDan employees fail to comply with our Code of Conduct.

## 4. Communication

Open dialogue and cooperation are prioritised focus areas in EnviDan's work with its Code of Conduct. We strive to make all employees and collaborative partners aware of our shared responsibilities, and we encourage a continual dialogue regarding our problems, challenges and success stories.

### 4.1 Internal

All employees at EnviDan must always have access to and be familiar with EnviDan's Code of Conduct. This means that:

- all employees are able to access the Code of Conduct on the intranet
- all employees know who they can speak to should they have any questions, doubts or problems understanding or applying the code

### 4.2 External

All collaborative partners must have access to and be familiar with EnviDan's Code of Conduct. This means that:

- all collaborative partners can access the Code of Conduct on EnviDan's website
- all collaborative partners know who they can speak to should they have any questions, doubts or problems understanding or applying the code

## 5. EnviDan's Code of Conduct

### 5.1 Human rights and employee rights

EnviDan's work with human and employee rights is based upon the principles of the UN's Declaration of Human Rights as well as a number of ILO conventions on the rights of workers.

At EnviDan we support and respect internationally recognised human rights.

We believe that all people have rights: the right to fair and proper employment and working conditions, the right to feel safe and to be treated with respect and dignity.

We therefore expect that all employees in EnviDan as well as our collaborative partners:

- as a minimum, comply with national legislation
- acknowledge and respect the human and employee rights listed in items 5.1.1-5.1.7

### 5.1.1 Employment terms

#### Wages and contract

- Wages shall be paid in accordance with local legislation on minimum wage, wages for overtime and payment of wages
- All employees must at minimum be paid a regularly paid a living wage, which ensures for the employee and their relatives a reasonable standard of living
- All employees have the right to a fixed and binding employment contract

#### Working hours

- Local legislation on working hours must be complied with
- A normal working week must not be more than 48 hours.
- Overtime should be voluntary and must be restricted to 12 hours a week for shorter periods
- For each 7-day working period, the employee is entitled to at least 24 hours' free time
- All employees have the right to a 30-minute break from work every 4 hours

#### Holiday and leave

- All employees have the right to holiday and leave in accordance with local legislation
- Pregnant employees and those on maternity leave may not be dismissed

### 5.1.2 Terms of employment

#### Health and safety

- It is the employer's duty to ensure that the working environment at minimum meets national legislation
- All employees must be protected against health and safety risks in connection with the execution of their work
- No employee may be exposed to harm in connection with the execution of their work
- All employees must be supplied with safety equipment, and the employer must ensure that the equipment is used where prescribed by law
- All employees must be trained and/or taught in the work they carry out

## Hygiene and food

- All employees must have access to safe and hygienic toilet facilities
- All employees must be offered hygienic and safe storage and eating areas
- All employees must have access to safe drinking water at all times

## Illness and vaccinations

- In the event of urgent need of medical care, all employees have the right to consult a doctor during working hours
- The employee has the right to compensation in case of lasting injury as a result of an accident at work
- All employees must be vaccinated in accordance with national legislation and local guidelines

## Special needs

At EnviDan there is room for employees with special needs. Consideration is given to employees with special needs in relation to the arrangement of work tasks. Special needs can be of a mental, physical or religious character and so on.

- It is the employer's duty to ensure that all employees with special needs, regardless of the cause, are accommodated as best as possible in the allocation of work tasks
- It is the individual employee's responsibility to inform the employer of any special needs, should the employee wish the employer to take this into consideration in the allocation work tasks
- The employee's absence due to a special need must take place with consideration for the completion of the work

### 5.1.3 Forced labour and punishment

EnviDan does not tolerate any form of forced labour or physical or psychological punishment.

Forced labour is work that is undertaken involuntarily or under threat of punishment.

#### Forced overtime

- No employee may be forced to carry out overtime, for example by being locked in or threatened with a deduction in wages, physical punishment or of being fired

#### Human trafficking and freedom of movement

- EnviDan does not tolerate any form of slavery or trafficking, where people are abducted and recruited on the basis of threats, violence or the settlement of debts
- All employees shall have freedom of movement and must not be withheld **from doing so via the deprivation** and retention of ID papers

#### Violence and harassment

- EnviDan does not tolerate any form of physical or psychological punishment of employees, and all employees must be protected against any form of physical or psychological violence, threats or sexual harassment
- In the case of a breach of disciplinary rules, sanctions in the form of fines or deductions from wages may not be used

#### 5.1.4 Sexual services

EnviDan does not tolerate any form of participation in or purchase of sexual services in a professional capacity.

By sexual services it shall be understood to mean the purchase of sex, stripper, massage and escort services, other pornographic material, internet performances and the like.

- All employees at EnviDan are obliged to distance themselves from the purchase and/or participation in sexual services in a professional capacity
- All employees at EnviDan are obliged to distance themselves from the purchase and/or participation in sexual services made by customers, collaborative partners and suppliers.
- All employees at EnviDan are obliged to notify their immediate superior at EnviDan of a violation of these terms

#### 5.1.5 Discrimination

Discrimination of employees in hiring, tenure or dismissal is not permitted.

- All groups of employees must be treated equally and must not be subjected to discrimination in relation to their religion, nationality, political beliefs, caste, sexual orientation, family obligations, trade union affiliation, age, gender or handicap
- Wages, allowances and benefits must be equal to work of the same value
- Employees must not be forced to act in conflict with their religion, political beliefs, caste, sexual orientation, family obligations or affiliation to a trade union

#### 5.1.6 Freedom of assembly, expression and association

All employees must have a right to freedom of assembly, expression and association without fear of reprisals.

- All employees have the right to organise and or affiliate themselves to a trade union or other professional organisation of their own choosing to handle the employee's employment rights
- The employer must not influence the employee to choose a particular trade union or organisation
- Union representatives shall have access to the workplace and the opportunity for open dialogue with the employee
- If the freedom of assembly and association is restricted by law in the country in question, then the employer must ensure open channels of communication as well as other opportunities for negotiations between the employer and employee
- All employees have the right to collective negotiations and are entitled to express their opinion on working conditions via an open dialogue
- The employer is obliged to react to any disputes and negotiations
- All employees have the duty/right to express themselves without consequence to their employment terms or career if the employee experiences a violation of regulations, collective agreements, or the

Code of Conduct, or suspects corruption or problems with a collaborative partner's or customer's behaviour, etc.

- To the greatest extent possible, concerns about possible violations shall be handled internally in the organisation between the employer and the employee
- The employee can voice their concerns to the immediate supervisor (in regard to the person to which the matter concerns), the Chairman of the Board, Managing Director, HR organisation, HSE representative, VG/FK, etc.

### 5.1.7 Child labour

At EnviDan we do not tolerate any form of forced or slave labour, psychological or physical punishment or the sale, financial exploitation or misuse of children.

Child labour is here defined as work performed by children up to 18 years, and which is carried out at the expense of the child's health, development and/or school attendance.

It is not EnviDan's wish for children to be pressured into work, but we need to recognise that in some countries it can be a necessary precondition for survival and a better standard of life. By forbidding children from working, we run the risk that the child ends up in a far worse situation, one where the child's family starves, or where the child is pushed into worse and often hidden occupations, where the child is exploited, and no one considers the child's rights. We will not contribute towards such negative outcomes..

At EnviDan we therefore do not believe that a total ban on children working is the most responsible solution. Instead, we wish to ensure that the child's family do not lose a vital source of income, while also ensuring to the greatest extent possible that the child is given the opportunity to develop and to be a child.

The employer is therefore committed to monitoring the child closely, to protecting the child and to placing the child's best interests first.

- If national legislation permits it, children aged 12-15 may perform light and simple work tasks for a couple of hours a day
- The child must be guaranteed a proper wage
- The child must be protected against work that is dangerous or hazardous to health
- The work must not harm the child's health and development
- The work must not hinder the child's opportunities for school and education
- Child workers must not be dismissed without additional measures and without securing the best possible conditions for the child in the future
- If possible, an older family member should be offered work rather than the child

## 5.2 Collaborative partners and customers

EnviDan enters into many different collaborations and partnerships and carries out many different tasks for a wide range of customers, including municipalities, public utilities and industries.

We at EnviDan are therefore committed to, **on an ongoing basis**, considering whether it is expedient to enter into these collaborations and partnerships, and whether it is appropriate for our image and in agreement with good business conduct to carry out tasks for all types of customers.

We therefore place demands, that all employees at EnviDan:

- make a decision as to whether it is expedient to enter into the specific collaboration with the other party/parties
- make a decision as to whether it is expedient to enter into the specific collaboration with those particular customers
- cast doubt on the expediency of the specific collaboration by referring the matter to the immediate superior, who can help to clarify the situation, if necessary, at senior management level

## 5.3 Environment

EnviDan's efforts in relation to environmental impact and challenges are based and build upon the principles in the international declaration and action plan Agenda 21.

At EnviDan we wish to be an environmental flagship that contributes to better living conditions for humans, plants and animals in both Denmark and internationally.

At EnviDan we are therefore committed to taking a shared responsibility and to integrating consideration for the environment into our overarching strategy, our consulting and our everyday work and behaviour.

We strive to minimise the impact of climate change, to prevent environmental and climate problems and to promote sustainable development and environmentally friendly solutions.

We therefore expect that all employees at EnviDan and our collaborative partners to:

- at minimum, comply with national legislation
- acknowledge and respect the environmental requirements laid down in items 5.3.1-5.3.2

### 5.3.1 Protection of environment and climate

An assessment of the overall environmental and climate effects shall be carried out regularly, with a view to **incorporating opportunities for reduction into all our operations?**

Activities must be implemented to identify and minimise negative environmental effects, including the use of resources, with particular focus on non-renewable resources, emissions into the immediate environment and using the best available technology (BAT).

### 5.3.2 Industrial accidents and spills

The surrounding community must be informed of any health and safety problems concerning accidents and spills and shall be compensated for any distress it may cause.

## 5.4 Anti-corruption

EnviDan's anti-corruption stance is based upon the principles in the UN's Convention against Corruption. EnviDan's anti-corruption policy is described in more detail on ConnectED (insert: link to anti-corruption policy on ConnectED).

At EnviDan we support the international fight against corruption.

At EnviDan we therefore expect that all employees as well as collaborative partners avoid all forms of influence, which illegitimately influence opinions, decisions and behaviour and that they comply with the anti-corruption requirements laid down in items 5.4.1-5.4.5.

#### 5.4.1 Bribery and gifts

Monetary amounts and gifts must be given and received in accordance with EnviDan's guidelines. Monetary amounts and gifts with the purpose of influencing decision processes must not be given or received.

#### 5.4.2 Breach of trust, embezzlement and fraud

Misappropriation or misuse of trust funds such as money and property must not take place.

Persons or organisations must not be misled to act inappropriately and against their own wishes in order to elicit an unjustifiable financial loss.

#### 5.4.3 Blackmail

The exercising of power in the form of force, violence or threats is not permitted.

#### 5.4.4 Conflicts of interest and favouritism

Conflicts of interest that inappropriately influence the professional workplace should be avoided.

Friends and family may not benefit without an assessment of their abilities, qualities and professional expertise.

#### 5.4.5 Economic crime

At EnviDan we do not tolerate any form of economic crime, including conscious tax avoidance or accomplices to this.

We therefore expect that all employees at EnviDan who become aware of any economic crime and tax avoidance internally in the organisation, with collaborative partners or our customers, present the case to their immediate superior at EnviDan, to the highest management if necessary, who will then take a decision on the next steps.