

AARSLEFF CODE OF CONDUCT

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Introduction

Aarsleff is a subsidiary of the international concern PER AARSLEFF based in Denmark. We work as a subcontractor and contractor of infrastructure construction projects. Poland makes demand for a well-developed infrastructure, as this is a condition of sound economic growth. Our company has actively contributed towards this for many years now.

Aarsleff Code of Conduct defines business ethic principles applying to all the employees in Aarsleff. These principles are also promoted among our business partners.

We are a reliable business partner. We observe agreements entered into with customers, subcontractors, partners, colleagues, suppliers, authorities and any other entity we contract with as a result of our business activities.

We make every effort to be seen as reliable, diligent and careful in our work. We always respect our clients and partners. Openness, trust and a will to cooperate are essential elements within Aarsleff's culture.

1 Aarsleff's mission and corporate values

Mission

Aarsleff carries out engineering and contracting activities at a highly professional level with the aim of satisfying client demands while creating expected value for employees, shareholders and other interested parties.

Corporate values

Life and health

Protection of human life is of highest importance for us. Safety of our employees, business partners and users of the facilities erected by our company is our highest priority. We offer decent working and personal development conditions. We recognize the need for balance between work and personal life.

Trust

Relations between our employees are based on mutual respect and trust. Owing to our knowledge, experience and commitment as well as the use of the latest technologies and commitment to quality, day by day we build trust of our clients and business partners.

Sustainable development

We meet the shareholders' goals and objectives at the same time ensuring high profitability. The achieved profits allow us to ensure healthy and safe working condition and invest in company development in an environment-friendly way. We promote activities aimed at contributing towards the creation of solid foundations for solving current social problems.

2 Foundations for relations between employer and employees

In relations between the company and employees, our highest priority is mutual trust and proper fulfilment of obligations ensuing from the laws, internal regulations, concluded contracts and Aarsleff Code of Conduct.

We expect initiatives to be taken on all organisational levels, and we shall ensure that we are always responsive to good ideas. We expect every employee to make an effort to attain our goals and objectives on the individual work sites.

2.1. Employer's responsibilities

As a responsible employer we ensure:

- recognition of human rights and employees' rights, in particular prevention of all forms of harassment and discrimination;
- all the available measures for protecting employees' life and health during their work – continual monitoring of workplaces to prevent possible diseases and hazards to life and health;
- care for maintaining relations of mutual respect, goodwill and tolerance between the employees;
- fair employment conditions and highest possible working environment standards;
- equal opportunities for the employees, both in the recruiting process and career development;
- support for employees wishing to improve their qualifications;
- recognition of employees' rights to form or join trade unions.

2.2. Employees' responsibilities

We expect responsible behaviour from our employees in their working environment, in particular:

- honesty, loyalty and commitment to work;
- observance of the laws and company's internal regulations and provisions of Aarsleff Code of Conduct;
- making every possible effort to ensure the highest quality of the rendered services;
- avoiding situations where personal interest is in conflict with company's interest and in the event of such occurrence, immediately notifying the superiors;
- taking care of the entrusted assets;
- maintaining confidentiality and making use of confidential information only to the company's benefit;
- making use of the company's potential only for activities related to the duties and obligations ensuing from the terms of employment; we shall not tolerate gaining personal benefits from corruption practices and acting against the benefits of the company.

2.3. Occupational safety and health issues

Since the character of the performed work poses a serious hazard to our employees' health or life, our highest priority is constant monitoring and improvement of safety levels.

We plan the work carefully. Occupational health and safety aspects are taken into consideration during planning and choice of work method. Order and tidiness and a systematic layout of the individual workplaces are given priority during our working day.

We are committed to enhancing occupational health and safety issues on an on-going basis and we expect all employees take responsibility and learn from their own and others' experiences. All the employees are knowledgeable of health and safety issues related both to themselves and their colleagues and are obliged to taking relevant measures if identifying unacceptable conditions.

In the daily work, we constantly focus on observing the occupational health and safety issues at the individual workplaces. We assess the observance of applicable regulations on an on-going basis and take disciplinary actions in case of negligence in this respect.

3 Relations with business partners

Determination in ensuring the highest possible quality of the performed work as well as observance of technical requirements are the foundation on which our partners' trust is built. A sustainable approach to the company growth guarantees long-time business operation owing to our customers' trust.

All Aarsleff's employees must comply with the laws and principles of business ethics. Violations must be reported to the General Director, who must take appropriate action.

We act according to applicable competition laws. We do not offer or receive any undue benefits or other considerations to and from any person or entity.

In order to avoid conflicting interests all the company's employees are obliged to immediately notifying the General Director of all the personal and financial relations with co-operators and competitors.

We shall ensure equal treatment of business partners. The criteria for appointment of suppliers and subcontractors are objective, impartial and unambiguous. We expect from our partners reliability, qualifications for rendering services of the highest quality, strict observance of the occupational health and safety regulations and preserving the environment and its resources.

4 Environmental responsibility

We are aware that our activities influence our surroundings. Therefore we always take into consideration environmental laws and regulations as well as detailed requirements received from our clients. We avoid excessive material, water and power consumption and strive to reduce greenhouse gas emissions in every stage of production, design and work performance.

We promote awareness of environmental considerations among our employees and business partners and encourage priority to be given to these issues in the interests of the present and future generations.

5 Compliance with the laws and recognition of human rights

Aarsleff acts in accordance with the applicable laws. We recognize and fully support the provisions of the *Universal Declaration of Human Rights* adopted by United Nations, *European Convention on Human Rights* and the conventions and recommendations issued by the International Labour Organization (ILO).

Our internal regulations include detailed rules on equal treatment and prevention of discrimination, harassment and corruption.

6 Dissemination of Aarsleff Code of Conduct and clarification of doubts

Dissemination of the principles defined *Aarsleff Code of Conduct* is responsibility of the General Director in cooperation with the Ethic Representative, appointed to propagate the principles of business ethics in the company's daily operations, investigate the reported cases of violations and take effective recovery actions.

Each employee of Aarsleff is obliged to become acquainted with the provisions of Aarsleff Code of Conduct and comply with them in every situation.

This Code of Conduct is received by each Aarsleff's employee at employment entry. It is also available on website www.aarsleff.com.pl.

7 Reporting suspected violations of laws or provisions of Aarsleff Code of Conduct

We provide our employees and other persons related Aarsleff with an opportunity to report on any suspected violation of the laws and provisions of *Aarsleff Code of Conduct* and internal regulations, in particular concerning the occupational health and safety issues and harassment as well as all other violations of the principles of business ethics. Unacceptable conditions can be reported without risk of consequences. We shall guarantee proper consideration of such notifications and taking appropriate measures.

7.1 General

- If there is a reasonable suspicion of violation of the laws, provisions of Aarsleff Code of Conduct or other internal regulations, the employees should, in the first instance, refer to their direct superiors or to the General Director.
- If there are justified reasons for not referring to the superior for help to solve a problem or for clarification of an ethical dilemma, the case should be reported to the Ethic Representative.
- The violations should be reported personally. Aarsleff ensures confidentiality and anonymity to the persons reporting on suspected violations as well as to other persons participating in the investigation process.
- In exceptional cases, it is also possible to report violations anonymously.

7.2 Methods of reporting the suspected violations of laws or provisions of Aarsleff Code of Conduct to the Ethic Representative

Suspected violations can be reported:

by e-mail to: <u>etyka@aarsleff.com.pl</u>,

or

by letter to the following address:

Rzecznik ds. Etyki/Ethic Representative Aarsleff Sp. z o.o. al. Wyścigowa 6 02-681 Warszawa

7.3 Protection of the person reporting a suspected violation of the provisions of *Aarsleff Code of Conduct*

Aarsleff ensures confidentiality and protection of personal data to all the persons deciding to report suspected violations of the laws or provisions of *Aarsleff Code of Conduct*. Moreover, it is also ensured that the investigation process shall be conducted with full discretion. This is particularly aimed at avoiding any negative consequences for the employee reporting a suspected violation. Personal data protection is not applicable in cases where disclosure of personal information is required by law.