

Ethical code of conduct for the Aarsleff Group's collaboration partners

It is embedded in Aarsleff's culture to take responsibility for our employees, our business and the surrounding community. We want to create value through development, transformation and innovation to achieve our sustainability goals and contribute to the green transition of the building and construction industry.

Ethical code of conduct for collaboration partners is an integrated part of Aarsleff's contract paradigms and applies to cooperation with all companies in the Aarsleff Group. Collaboration partners should be understood in a broad sense and includes all collaboration partners such as joint venture partners, suppliers, subcontractors, consultants and rental companies.

We also expect that our collaboration partners take social responsibility and help promote responsible and sustainable business behaviour. This means that our collaboration partners can contact us at any time for guidance on the requirements of this ethical code of conduct and that Aarsleff is happy to share assessments and experiences on request.

The purpose of the ethical code of conduct

The purpose of Aarsleff's ethical code of conduct is to ensure that the Group's collaboration partners act in accordance with internationally recognised human rights, employee rights, climate and environment, anti-corruption, fair competition and tax – the so-called minimum standards.

Based on United Nations Guiding Principles on Business and Human rights¹ and the OECD's Guidelines for Multinational Enterprises on Responsible Business Conduct² we therefore expect as a minimum that our collaboration partners have processes and systems to avoid and address the negative impacts on environment and society as described in the minimum standards. We also expect our collaboration partners to have the similar requirements to their collaboration partners.

We recognise that establishing the necessary efforts and processes to support the requirements of our ethical code of conduct requires both time and resources. This code of conduct is therefore also a tool for collaboration and dialogue on improving systems to address negative impacts on human rights, including labour rights, climate and environment and anti-corruption.

Compliance with laws and rules

Aarsleff requires that collaboration partners comply with all laws, regulations, administrative practices and other applicable standards, e.g. collective labour agreements, in the countries where the collaboration partners operate. In the event of inconsistencies between Aarsleff's code of conduct and other regulations, we expect the highest standard to be applied.

Respect for international principles

Aarsleff respects internationally recognised principles and expects the same from our collaboration partners. This includes respect for human rights and as a minimum the rights expressed in the International Bill of Human Rights³ and the ILO Declaration on Fundamental Principles and Rights at Work⁴.

¹United Nations Guiding Principles on Business and Human Rights

²OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

³The International Bill of Human Rights

⁴ILO Declaration on Fundamental Principles and Rights at Work

Human rights and employee rights

In relation to human rights and employee rights, we draw attention to the following issues that have our special attention:

Terms of employment

Collaboration partners must ensure that the work is performed in accordance with recognised and documented terms of employment subject to national legislation in the country where the work is performed. All employees must have a written employment contract in a language understood by the employees. Part-time employment, trainee employment or similar with the purpose of offering lower wages or fewer benefits to your employees must not be used. Pay and working conditions must always be in accordance with national legislation where the work is performed, as well as applicable agreements and generally accepted standards for the industry in question. Collaboration partners must not make deductions from wages as a disciplinary sanction.

Working hours

Collaboration partners must ensure that our employees are not required to work more than the number of hours which is the local standard or which is determined in national legislation.

Occupational health and safety

Collaboration partners must ensure a good and safe working environment, cf. local legislation, where employees thrive, and where management and employees – and employees among each other – engage in a constructive collaboration with communication in a professional and respectful manner. Safety in the workplace must always be as good as possible, and collaboration partners must provide their employees with protective equipment and safety training. Likewise, collaboration partners must offer their employees good sanitary and living conditions.

Child labour

Collaboration partners must not use child labour under any circumstances and must meet the legal minimum age requirements which apply in the country where the work is performed. Employees under the age of 18 are not allowed to participate in hazardous work.

Offensive behaviour

Collaboration partners must ensure that their employees are not subjected to or subject others to offensive behaviour. This applies to both physical and psychological harassment, including bullying, violence, threats of violence, sexual harassment or any other form of harassment, abusive behaviour or derogatory language.

Diversity

Collaboration partners must offer equal opportunities to their employees. These include equality and equal pay regardless of gender, sexual orientation, age, educational background, nationality, physical abilities or disabilities, political orientation, ethnicity, family status, religion or ideology or for some other reason.

Holidays and absence

Collaboration partners must ensure that employees are entitled to holidays and absence due to illness, maternity or adoption in accordance with national law and shall not be dismissed or threatened with dismissal or demotion as a result of exercising the right to holidays or absence.

Right to organise

Collaboration partners must ensure that their employees have the right to join a trade union and to bargain collectively. In addition, the employee representatives must have the opportunity to perform their work.

Forced labour

Collaboration partners must ensure that their employees under no circumstances work under duress or any other form of non-voluntary labour. Employees must always be free to terminate their employment, and collaboration partners must not, for example, require employees to deposit their passports or identification documents.

Conflict minerals

Collaboration partners supplying minerals and metals must document that they understand the risks associated with sourcing from conflict-affected and high-risk areas and take appropriate steps to ensure that the sourcing of minerals and metals is done in a responsible manner and is not associated with human rights abuses, environmental degradation and violations of national and international laws. To ensure this, collaboration partners should be able to provide evidence of due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals or an equivalent framework.

Climate and environment

At Aarsleff, we are aware that our activities influence our surroundings. Therefore, we are committed to minimising environmental impacts through planning, design and selection of method. We measure significant environmental parameters and report on current improvements. We will seek to minimise waste and excessive consumption during our handling and consumption of materials. When purchasing, operating and maintaining machinery, we consider the environment and focus on reducing the use of fossil fuels and minimising our CO2 emissions. We also pay attention to proper waste management and the opportunities to reuse and recycle.

We expect our collaboration partners to establish appropriate processes to address negative climate and environmental impacts, including:

- Prevent and combat pollution of air, water, soil and subsoil as well as vibration and noise nuisance
- Reduce energy consumption and greenhouse gas emissions
- To minimise the use of greenhouse gas-emitting and polluting raw materials
- To promote recycling and reuse
- To limit the use and waste of raw materials and work for the sustainable use of natural resources
- To reduce waste and minimise disposal issues
- To protect biodiversity

Business ethics and anti-competitive behaviour

Aarsleff expects collaboration partners to establish appropriate processes to counteract all types of corruption and anti-competitive behaviour.

With our behaviour we want to contribute to a sound, democratic and competitive development of society in both Denmark and abroad. We work to ensure fair competition and we do not accept any form of anti-competitive behaviour. Collaboration partners must refrain from participating in any form of unfair competition, including participation in tender coordination, price cooperation, cartel formation, market sharing, abuse of market dominance or other measures in violation of competition rules or other legislation.

Fighting corruption and bribery

Aarsleff does not tolerate any type of corruption or bribery. Collaboration partners must therefore not offer or accept bribes, inappropriate payments and gifts or otherwise be involved in corruption or bribery. This also applies even if it is perceived as part of the local business practice.



Corruption includes abuse of entrusted power, embezzlement, kickbacks, extortion, fraud, nepotism, favouritism, bribery and facilitation payments. Corruption undermines legitimate business activities, distorts competition, damages brands and puts companies and individuals at risk.

Bribery can be an attempt to influence or encourage a particular behaviour or omission in others by offering or promising an improper advantage. Such a benefit could be gifts, cash, rewards, discounts, travel, accommodation, sponsorship or other benefits.

Establishment of processes to ensure access to raise questions about compliance with the minimum standards

Aarsleff expects collaboration partners to respect the fact that their employees or other affected persons can complain about the collaboration partner's failure to comply with the minimum standards without this having negative consequences for the complainant when the complainant is acting in good faith. Collaboration partners are also expected to provide effective access to redress by having processes in place to address complaints where collaboration partners have caused or contributed to a negative impact on the minimum standards.

Compliance and documentation

Upon request from Aarsleff, collaboration partners must be able to document in writing that they comply with this ethical code of conduct. In the event of non-compliance with the requirements, Aarsleff will focus on the collaboration partners' ability and willingness to cooperate on implementing measures that counteract the identified breaches. In case of unwillingness to resolve identified serious breaches or violations, including failure to submit documentation, Aarsleff reserves the right to terminate the collaboration.

If Aarsleff finds it relevant, we may ask the collaboration partners to complete a self-assessment. If the result of this self-assessment is not satisfactory, we may carry out audits or other actions with collaboration partners in order to clarify any breaches of this ethical code of conduct. Aarsleff expects its collaboration partners to collaborate loyally in this respect.

If collaboration partners identify serious impacts on minimum standards or breaches of this Code of Conduct within themselves or in their own supply chain in connection with the provision of the service, the collaboration partners must immediately notify the relevant Aarsleff company and submit a plan for handling the situation. If the impact or breach is caused by Aarsleff, collaboration partners can also make use of the Aarsleff Group's whistleblower programme⁵.

Anchoring and follow-up

Ethical code of conduct for the Aarsleff Group's collaboration partners has been approved by the board of directors of Per Aarsleff Holding A/S and at least once a year it must be reassessed with a view to ensuring that it continues to comply with legislation and the Aarsleff Group's policies, values and goals.

⁵ For more information, see [www.aarsleff.com/corporate social responsibility](http://www.aarsleff.com/corporate-social-responsibility)