

## Code of Conduct for Suppliers

This Code of Conduct (the “Code”) details what we expect from our suppliers in terms of their compliance with certain standards covering human rights, labour rights, environmental management and anti-corruption.

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### Introduction

Sund & Bælt is a state-owned company responsible for some of the largest transport infrastructure investments in Denmark.

Our vision is to be the leaders in financing, developing and operating and financing user-paid infrastructure in Denmark and Europe – and to do so in a sustainable manner.

Sund & Bælt actively pursues high standards for responsible behavior and systematically integrates those standards across our entire value chain from the initial analysis phase through to our projects’ design, construction and operational phases. As a responsible company, we also proactively pursue and promote these standards by means of our engagement with suppliers, who constitute an integral part of many of our operations, as well as through our relations with local communities.

This document outlines what we expect from our suppliers in terms of their compliance with international principles as set out by the UN with regard to human rights, labour rights, environmental management and anti-corruption, as defined in this Code.

The principles stated in this Code derive from the basic principles of the UN Global Compact, which is actively supported by Sund & Bælt (see <https://www.unglobalcompact.org/what-is-gc/mission/principles>).

Like many other companies, Sund & Bælt has signed up to the UN Global Compact in order to enhance its social responsibility.

The Code is an integral part of our supplier contracts and a precondition for establishing relationships. The Code covers both Sund & Bælt’s suppliers and sub-suppliers. It is the responsibility of the suppliers (S & B’s contract partner) that the sub-suppliers comply with the Code.

Sund & Bælt refers to Sund & Bælt Holding A/S as well as its fully owned entities, including Femern A/S, A/S Femern Landanlæg, A/S Storebælt, A/S Øresund, Brobizz A/S, BroBizz Operatør A/S and Sund & Bælt Partner A/S.

### General obligations

Our suppliers are responsible for ensuring compliance with the principles of this Code and for having in place policies, procedures and reporting mechanisms that support the principles that are appropriate to their sector and size.

In addition, suppliers are required to deploy appropriate measures to ensure that their sub-suppliers comply with this Code.

Upon request, suppliers must provide Sund & Bælt with documentation that demonstrate how they fulfill their obligations under this Code. That request may be stated based on a random or other selection among Sund & Bælt’s suppliers.

Upon request, suppliers must also engage in dialogue with Sund & Bælt on their compliance with the Code, including the compliance of their sub-suppliers. Suppliers as

well as sub-suppliers must also be prepared to accept inspections at their premises by Sund & Bælt or its representatives. In case an inspection must be conducted at premises abroad, Sund & Bælt will only do so with the assistance of a third party.

Should potential non-compliances be identified by the supplier, the supplier must inform Sund & Bælt without delay and propose measures that will ensure compliance with the Code. Sund & Bælt may choose to conduct its own assessment e.g. with the assistance of a third party.

If a supplier, by intention or repeated negligence, fails to live up to this Code in a manner that is explicit or severe, or if the supplier shows a continual refusal to make progress on issues identified during an assessment, Sund & Bælt has the right to terminate the contract with the supplier.

Specific requirements regarding supervision provisions or remedies for breach of contract will be detailed by Sund & Bælt in individual supplier contracts.

## Principles

### I. HUMAN RIGHTS

Suppliers are required to support and respect the protection of human rights as stated in the International Bill of Human Rights.

In a workplace setting, support for human rights requires suppliers to implement non-discriminatory practices, support diversity and maintain positive relations with local communities.

### Non-discrimination and support for diversity in the workplace

Suppliers must treat employees fairly and provide a workplace that is free from discrimination and respects diversity as regards gender, race, nationality, religion, marital status, sexual orientation, outlook and social status in the workplace arena.

These practices include but are not limited to hiring, remuneration and benefits, hours of work and rest/paid holidays, job assignments, occupational health and safety, protection and security of tenure, social security and access to training.

Suppliers are required to provide suitable workplace facilities for employees of different genders.

### Positive community relations

Suppliers are required to respect local communities where they operate on behalf of Sund & Bælt by proactively engaging and consulting with local communities and avoid causing or contributing to negative impacts on those communities. This may include impacts on the environment, natural resources, land and infrastructure and culture.

### Avoidance of complicity in human rights abuses or discriminatory practices

Suppliers must ensure that they are not involved in abuse of human rights caused by another business, government or individual.

Involvement in abuse can occur when a supplier or an individual representing a supplier fails to act and thereby facilitates another, in some way, to carry out a human rights abuse or discriminatory practice. Involvement can also take place when the supplier is aware that its act or omission to act could provide such help.

### II. LABOUR RIGHTS

Suppliers must comply with and embed international ILO conventions and the declaration regarding fundamental Principles and

Rights at Work. In particular, the following should be noted:

#### **Freedom of association and right to collective bargaining**

Suppliers are required to recognise and respect the right of workers to freely associate, organise and bargain collectively, including putting in place non-discriminatory policies and procedures with respect to trade union organisation and union membership.

Suppliers shall not discriminate against worker representatives and employees who choose to affiliate or not affiliate, and they are required to engage in bargaining with employee representatives in good faith.

#### **Equal employment conditions**

Suppliers must ensure that the wages, including special payments, working hours, sick leave and other employment conditions, of employees who contribute to the performance of a contract in Denmark are no less favorable than those that apply to work of the same nature under a collective agreement entered into by the relevant labour market parties in Denmark within the industrial area in question, and which apply to the entire Danish area.

#### **Hiring practices and forced labour**

Suppliers are required to avoid all forms of forced and compulsory labour in any work or service or to employ or make anyone work against their will. By right, workers should be free to leave in accordance with established rules.

#### **Abolition of child labour**

Suppliers are obligated to prohibit the use of child labour and ensure that no person is employed at an age younger than allowed under ILO convention 138.

Suppliers are obligated to protect young workers of legal working age from any type of employment or work, which by its nature or circumstance is likely to jeopardize their health and safety.

#### **Harassment and abuse**

Employees shall be treated with dignity and respect. We require our suppliers to prohibit the use of any form of harassment, abuse and coercion.

#### **Health and safety**

Suppliers are required to provide safe and healthy working conditions and take appropriate precautionary measures to protect employees from work-related hazards and anticipated dangers in the workplace.

Suppliers are required to have knowledge of, pay attention to and abide by all applicable laws and regulations to prevent accidents and injuries occurring in the course of work or due to the operation of employer facilities.

Suppliers are required to continuously improve working conditions and reduce workplace risks by, for instance, introducing a documented safety programme, conducting appropriate training and ensuring management responsibility for health and safety matters.

### **III. ENVIRONMENTAL MANAGEMENT**

Sund & Bælt strives to minimise any adverse impact on the environment and to pursue ambitious environmental targets in support of society's sustainable development.

Suppliers are required to strive to minimise adverse impacts on the environment and on human health. Suppliers must conduct their operations with care for the environment and comply with all relevant local and national environmental regulations and maintain all applicable licences, registrations and permits.

#### **Management techniques**

Suppliers are required to apply environmental management techniques, including the following:

### **Precautionary approach to environmental challenges through risk assessment**

Suppliers are required to conduct their activities responsibly with due regard for possible environmental risks and impacts by applying a precautionary approach to ensure that irreversible damage does not occur. Precautionary measures involve the systematic application of risk assessment, risk management and risk communication.

### **Promote greater environmental responsibility through targets and tools**

Suppliers are required to adopt a structured and systematic approach to avoid, minimise and mitigate environmental issues, including the setting up of targets for environmental impacts, the application of procedures and activities to achieve such targets as well as the deployment of monitoring and control mechanisms for the prevention of pollution and negative environmental impact.

### **Application of environmentally friendly technologies**

Suppliers are required to apply environmentally effective technologies and to strive to make use of technologies that reduce negative environmental impact.

Environmentally sound technologies are those that protect the environment, are less polluting, use all resources in a more sustainable manner, recycle more waste and products as well as handle residual waste in a more acceptable manner than the technologies which they replace.

### **Environmental challenges**

Suppliers are required to observe and actively contribute to the following environmental challenges:

#### **Climate change**

Suppliers must contribute to a lower embodied carbon footprint through the responsible use and selection of materials and en-

ergy use through transport and use of machinery. Suppliers must actively seek to lower their impact, for instance, through electrification.

#### **Biodiversity and ecosystems in water and on land**

Suppliers are expected to protect biodiversity and existing ecosystems and support the regeneration of the nature that has been affected by their activities.

#### **Use of materials and natural resources**

Suppliers must have a precautionary approach to the use of materials, including hazardous materials, and natural resources. Suppliers shall have a continuous focus on minimising the use of natural resources, and the use of materials with a lower carbon footprint and find environmentally friendly replacements wherever possible.

#### **Pollution of air, water and soil**

Suppliers must be observant of and adhere to national guidelines and implement necessary measures regarding emissions to air (noise, particles, vibration and light), discharges into watercourses and soil handling.

#### **Waste**

Suppliers have responsibility for their waste streams and comply with national and industrial guidelines for waste handling, including the sorting of waste at source. Suppliers are also expected to encourage recycling and the reprocessing of materials.

## **IV. ANTI-CORRUPTION**

Sund & Bælt promotes a high standard of integrity and ethics in all aspects of its activities and is committed to a zero-tolerance approach to criminal practices. In particular, the following should be noted:

### **No engagement in corruption in all its forms, including extortion and bribery**

Suppliers are required to maintain high ethical standards with regard to the conduct of their business. Suppliers must not tolerate or engage in any form of corrupt practices. Corruption includes bribery, facilitation of payments, embezzlement, fraud, extortion and money laundering. We require our suppliers to maintain adequate procedures for preventing all forms of corrupt practices on the part of their employees, suppliers and other partners.

**Avoidance of conflict of interests**

Suppliers are required to avoid any conflict of interests that may undermine Sund & Bælt's faith in them or a third party's faith in Sund & Bælt, i.e. through any form of engagement with associations whose values run counter to those of Sund & Bælt.

**Non-violation of trade sanctions**

Suppliers are required to ensure that business is conducted in a manner that does not violate UN or EU trade sanctions.