



# OUR WAY OF BEING

NCC:s Code of Conduct

NCC is active throughout the value chain in its efforts to create future environments for work, living and communications. This results in stringent requirements in terms of responsible enterprise and employees who accept responsibility. In this Code of Conduct, we describe the requirements we have established for the actions and behaviors of our Board members, management and employees and which we also assume are respected by all of our business partners.

# THE FOUNDATION FOR OUR CONDUCT IS REFLECTED IN OUR VALUES

## HONESTY

*We are honest to ourselves and to our stakeholders.*

We conduct business in a correct manner, the customer can always rely on the information we provide and neither our managers nor our other employees conceal the facts but have the courage to be forthright and unambiguous.

## RESPECT

*We respect each other, both privately and professionally.*

Everyone's viewpoint is valued, but once a decision has been made, everyone stands behind and supports that decision. People can hold differing viewpoints while simultaneously respecting each other and working constructively towards a given goal.

## TRUST

*We trust each other and behave in a manner that generates the trust of others.*

Everyone supports NCC and the company's values as the basis for powerful development. We do what we say we will do, thus creating an environment in which everyone pulls in the same direction.

# BUSINESS PRINCIPLES

NCC's customers and other stakeholders must view NCC as a reliable and honest company that always lives up to its commitments. NCC strives to achieve long-term business relations as a basis for generating customer value, shareholder value and secure workplaces conducive to development. Our Code of Conduct must always be communicated as a natural feature of cooperation with partners.

## LAWS, REGULATIONS AND INTERNATIONAL CONVENTIONS

A basic requirement is that we act within the framework of laws and international conventions. We respect and comply with competition rules, environmental legislation, labor market laws, agreements and safety requirements, or other provisions that set the parameters for our operations.

## AGREEMENTS

NCC displays honesty and openness in its dealings with business partners. We live up to the commitments we have made. Established agreements apply. Our business partners must feel that they are an important prerequisite for ensuring that joint business ventures are as successful as possible.

## COMPETITION ISSUES AND CONFLICTS OF INTEREST

NCC does not permit any form of pricing collaboration, cartel building or abuse of its market dominance, and supports, in all phases of its operations, correct and unrestricted competition in regard to bids, tenders, procurement and purchasing.

NCC employees are obligated to inform their immediate superior of any business activity that the employee conducts outside the NCC Group.

Employees are not permitted to work or participate indirectly in business activities for an organization that competes/engages in business with NCC.

NCC employees are not permitted to engage in activities that could lead to conflicts of interest, or to exploit relations with business partners for personal gain. This includes providing or accepting personal gifts or services of a value exceeding a specified level, or participating in expenses-paid activities beyond normal business requirements. It also includes requesting or providing any form of promise connected to the acceptance of gifts.

While NCC does not subscribe to any party-political position, employees are encouraged to take an active interest in social issues provided they adhere to normal rules regarding partiality.

# HUMAN RIGHTS AND WORKING PRINCIPLES

NCC supports and respects international conventions concerning human rights.

NCC promotes diversity and equality. Equal treatment and equal opportunities must apply to everyone regardless of ethnic or national origin, skin color, gender, sexual orientation, religion, political opinion, nationality or social origin.

NCC does not accept any form of mental or physical punishment, threat of punishment, discrimination in employment opportunities or work, bullying at the workplace, or sexual or other harassment, forced labor or other types of involuntary work.

NCC values a healthy balance between work and leisure and works actively to ensure that the employees achieve this.

The operations and the projects in which NCC is involved shall be characterized by a safe, healthy and hygienic work environment. Our work in accordance with work-related accidents and personal injuries is subject to a zero vision.

Obligations toward employees pursuant to national laws and agreements on social security must be respected and followed. Pay and other benefits shall at least fulfill national laws, applicable agreements and the generally accepted standard for the industry.

Child labor is absolutely not permitted. Employees and other personnel must be at least 15 years of age or have reached the age for completing compulsory schooling, whichever is the higher.

Employees' rights to organize themselves in optional employee organizations and to negotiate collectively must be respected. Employee representatives must not be discriminated against and must be given the opportunity to perform their duties.

# ENVIRONMENTAL RESPONSIBILITY

Major construction projects represent enormous investments for the clients and the community at large. Before and during the project engineering of major construction projects, NCC and the client must jointly strive to ensure that the investment leads to the best possible value creation, and to achieve a balance between considerations concerning individuals, community interests, environmental aspects and commercial interests.

In all of its undertakings, NCC strives to create optimal conditions in terms of environmental impact and energy and resource efficiency during the entire lifecycle of each structure.

NCC shall create healthy built environments for the people who will be occupying them.

In all of its operations, NCC strives continuously to reduce climate impact, focusing primarily on the energy

and transport areas, and to conform to or surpass the requirements of national or international regulations or agreements concerning the reduction of emissions and discharges to air, land and water.

In all of its operations, NCC must reduce its use of harmful substances, ensure that the handling and landfill disposal of waste is performed in a safe and environmentally compatible manner, and contribute to recycling.

# COMPLIANCE AND FOLLOW-UP

## RESPONSIBILITIES OF THE COMPANY AND THE EMPLOYEES

Compliance with the Code of Conduct is a matter for Group Management – and for managers at levels of the Group down to the individual employee.

Every manager has an obligation, within his or her area of responsibility, to ensure that employees and business partners are informed of the contents of NCC's Code of Conduct and the need for compliance with it. Managers within NCC must always set a good example.

## FOLLOW-UP

Compliance with the contents of the Code of Conduct is followed up continuously as a natural part of ongoing operations.

Repeated and serious breaches will result in corrective action.

If any of NCC's business partners repeatedly and seriously violates the Code of Conduct, cooperation will be discontinued.

