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Our Internal Code of Conduct – Ethical Guidelines

Purpose

To describe GK Gruppen's Code of Conduct and ethical guidelines.

Responsibility

Group management is responsible for defining GK's Internal Code of Conduct.

Introduction

GK's Code of Conduct defines the principles for all our commercial activities, both as individual employees and as an organisation. The Code is intended to ensure that our values and ethical guidelines are embedded in all companies in the GK Group.

Our ethical guidelines are supported by all statutory requirements that apply to our activities, in addition to detailed policies and agreements, to which the principles and expectations described in our Code of Conduct apply.

As a member of the UN Global Compact, GK has pledged to uphold the organisation's ten principles for responsible business encompassing human rights, labour, the environment and anti-corruption. We further support all human rights as described in the Universal Declaration of Human Rights, and in the conventions of the International Labor Organization (ILO), an agency of the UN.

We have also endorsed the principles supported by the World Economic Forum's Partnering Against Corruption Initiative (PACI).

Why do we have a Code of Conduct?

GK's mission is to build a sustainable society for future generations and our vision is to be a climate role model. Our values oblige us to act in accordance with the highest ethical standards and run our business in a responsible and sustainable manner.

Our internal Code of Conduct is based on our shared values and our ethical principles. By following our Code of Conduct, we not only ensure that we have an ethically responsible working environment, but we also contribute to profitable and efficient operations.

GK has zero tolerance for corruption, bribery, restrictive competitive practices, discrimination, bullying, harassment or any type of unlawful action. All GK's activities are based on the ethical principles described in our Code of Conduct and the laws and regulations that apply to us.

Our values

Everyone at GK shares core values that govern what we do and how we act. This underpins our culture and guides our choices, both as a company and as individuals. These values are not just words, but specific guides that help ensure we make the right choices.

Inclusive

At GK we share our knowledge and experience, and recognise each other's disciplines and working situations. We believe that diversity plays an important role in creating a good workplace. At GK we are inspired by differences, and we build mutual trust through openness, respect and teamwork. This is how we create a sustainable working environment for future generations.

Curious

Curiosity is the basis of all innovation, which in turn drives all development. Therefore we are curious about our own and other's disciplines and how we can work together to create more efficient, profitable and environmentally friendly solutions that help establish a sustainable society for future generations.

Responsible

Being responsible is a question of what we are and what we do. We can be relied on, and do what we say we will do. This is how we create the trust that is required to generate a forward-looking, value-creating and highly skilled business that develops sustainable solutions for future generations.

Who does our Code of Conduct apply to?

Our Code of Conduct defines how we as GK employees must treat each other, our customers, the rest of society and other stakeholders. Our Code of Conduct applies to everyone who works in the Group and our subsidiaries, irrespective of their role, position or terms of employment, including our Board of Directors.

GK is not an island, and we make the same requirements of our suppliers and their subcontractors as we do of ourselves. GK has a dedicated Code of Conduct for Suppliers that affirms the principles that GK requires our suppliers to accept and follow.

How do we use our Code of Conduct?

Our Code of Conduct provides us with help and guidance on challenges and ethical dilemmas and states who we should contact if we have any questions.

The Code does not cover all possible dilemmas or situations we may encounter. Different challenges will continue to arise as our business evolves, and in future we may face new situations where we are uncertain about what we should do to comply with laws and regulations. In such cases we must still maintain high ethical standards, and it will be important to seek advice to be able to make the right decision.

In addition to describing our own ethical standards, our Code of Conduct also requires us to follow all applicable laws and regulations. You must always be familiar with the laws in the area in which you work, and seek guidance if you have any questions.

Ethical dilemmas

If you are facing an ethical dilemma and are not sure what to do in a specific situation, ask yourself:

- Is the proposed course of action legal?
- Is it consistent with GK's values, ethical guidelines and procedures?
- Would I be comfortable telling my colleagues, managers, friends and family about the matter?
- What would be the consequences if it were reported in the mainstream or social media?
- Is it morally justifiable?

Notification – speak out!

GK encourages a culture of transparency and urges anyone who observes or experiences anything that violates our values or ethical guidelines and could impact our company or people's life and health to speak out. We attach importance to ensuring that anyone who reports a problem will never suffer reprisals and can be sure that there will be an appropriate investigation process.

As a general rule, you should notify your line manager or, if appropriate, your manager's immediate superior. You can also report the matter to HR or our legal department. If you want to remain anonymous, you can report through GK Whistle, our anonymous notification (whistle-blowing) service.

How we conduct ourselves in the workplace

Working at GK is not only a question of upholding our values and ethical guidelines. It's also about managing GK's assets in a responsible manner and creating a fair, sustainable and safe workplace. You must make your contribution by acting professionally and by promoting an inclusive, curious and responsible culture where everyone feels welcome.

Personal conduct and behaviour

Everyone at GK must treat colleagues, customers, suppliers, business associates, colleagues and others they come into contact with through their work with respect and integrity.

Health and safety

GK systematically works to ensure a safe and healthy working environment for everyone, both at our customers' sites and at our own offices. GK strives to be a role model in our sector, and safety is central to everything we do. This means:

- We care about our employees and about the people who are affected by the work we perform in our projects.
- We constantly strive to develop a working environment conducive to health, safety and job satisfaction.
- We ensure visible leadership, which is critical for good health and safety and a good working environment.
- We promote and share good practices around personal safety and accident prevention along our entire value chain, in our own projects and within the industry.
- We require our subcontractors, suppliers and partners to follow our guidelines for safety and our Code of Conduct for Suppliers.

- We provide training and education on health and safety that is relevant to our employees' work situations and working environment.
- We ensure that employees at our subcontractors receive adequate training and have the right equipment to be able to perform their work safely.
- We aim to be a sector leader in health, safety and the environment, making continuous, measurable improvements towards our goal of being a zero-harm working environment.
- We comply with all legislation and regulations on HSE.

Fair working conditions

As a GK employee, you are entitled to be treated with respect and dignity and you must also respect the dignity, privacy and rights of every individual you come into contact with, and everyone who is affected by our activities. All employees' working conditions must satisfy national and local legislation and the ILO standards we have endorsed. This means a decent working environment, adequate pay for work performed and fair treatment and employment rights for everyone.

We do not accept any form of child labour or forced labour in our workplaces or our supplier chain, including illegal practices or unlawful withholding of pay.

We recognise and respect our employees' right to freedom of association and collective bargaining.

We must enjoy good and mutually respectful relations with employee organisations, trade unions and employee representatives.

As a GK employee, you are responsible for speaking out if you become aware of poor working conditions at our company or any of our suppliers or subcontractors.

Inclusiveness and diversity

GK aims to be an attractive and inclusive workplace that offers good working conditions, a safe working environment, diversity and gender balance. GK does not accept any form of harassment, discrimination or other behaviour that may be perceived as threatening or degrading. The company's managers have a particular responsibility to promote transparency, loyalty and respect.

Everyone must have equal opportunities to realise their potential and grow both personally and professionally in our business, regardless of gender, ethnic background, religion, beliefs, disability, sexual orientation, gender identity or other important personal matters.

GK's assets

GK's assets are everything our company owns or uses to operate our business, including equipment, facilities, systems, information and data. Protecting the company's assets is a key responsibility for everyone.

Intangible assets such as trademarks, works protected by copyright, inventions, business secrets, knowledge and data relating to our business are often valuable and must not be used for purposes not connected to GK.

GK's assets, such as tools, equipment and materials must only be used for business purposes. All surplus materials at the end of a project also belong to GK. GK's assets must not be used for private purposes or private activities.

Equipment that is made available to employees or is part of other employee benefits, such as PCs, phones and vehicles, must be used in accordance with local legislation and GK's own guidelines.

Personal data

GK must ensure that all personal data is recorded, compiled, stored and deleted with integrity and confidentiality in accordance with applicable laws, regulations and the General Data Protection Regulation (GDPR).

GK respects employees' rights to privacy and ensures that only authorised personnel have access to personal data. Employees must only have access to personal data for specific business purposes, and must not access data for other reasons.

Employees must not share personal information with anyone, unless this is authorised or required under law. Authorised personnel must only be able to use personal data when this is required for work assignments, and must handle the data with integrity and confidentiality. Requirements for processing personal data must not be overridden by requirements for access.

Confidentiality

Information that employees acquire in connection with their employment relationship with GK or through collaboration with customers and suppliers must be treated confidentially and under no circumstances be shared with unauthorised parties. Employees who possess confidential information must be aware of this and loyally comply with established non-disclosure agreements (NDAs).

How we act in the market

GK aims to have Scandinavia's strongest brand in our sector. We wish to be the preferred choice for customers and partners who value innovative and sustainable solutions. This will help us have the industry's most satisfied customers. Our customer relationships must be characterised by integrity and mutual respect, and we must treat our customers in accordance with our values and ethical guidelines.

GK is an important player in our industry and we are expected to be a responsible company that shows respect for our customers, suppliers, partners and other stakeholders. GK must never be involved in unlawful business practices. We always perform our work with a high degree of integrity, and as GK employees we are always expected to do our best to deliver high-quality results on time and on budget.

GK complies with applicable laws and regulations for ethical trading and does business in a sustainable and socially responsible manner. Ethical business practices will help ensure that goods and services are produced in line with internationally recognised standards on human rights, labour and the environment.

Competition

GK supports fair and open competition. GK's activities and employees must under no circumstances cause an infringement of the competition rules, for example through price-fixing, illegal market sharing or any other conduct that prevents, restricts or distorts competition in violation of applicable competition laws. GK must treat competitors with integrity and respect.

Conflicts of interest

GK's employees must avoid situations where a conflict may arise between their own personal and/or financial interests and GK's interests. Employees with purchasing authority at GK have a special obligation to act with objectivity and integrity, to avoid any doubts about the reliability and impartiality of their actions. GK expects employees to be loyal to the company and prohibits them from acting in competition with GK.

Corruption and bribery

GK has zero tolerance for corruption. Corruption takes many forms and covers everything from gifts of a disproportionately high value, to carefully planned bribes and systematic covering of one's tracks. No GK employee may directly or indirectly participate in activities that violate anti-corruption legislation.

This means:

- GK's activities and employees must never, directly or indirectly, offer, promise, demand, require or accept unlawful or unfair monetary benefits or other remuneration to gain or confer preferential commercial treatment.
- GK's activities and employees may never request, demand or accept benefits from customers, subcontractors, suppliers or other parties or their representatives, employees or consultants, if such benefits are offered in an attempt to achieve unlawful benefits.
- Any act that could involve bribery is forbidden.
- All costs, outlays and income are properly recorded in GK's accounting systems together with all required documentation, and in accordance with generally accepted accounting practice.
- Employees must always consult with their line manager if they are unsure whether a gift or other benefit may contravene these principles.

Fraud and money laundering

Money laundering is the illegal process of making large amounts of money generated by a criminal activity appear to have come from a legitimate source. GK must under no circumstances participate in operations or activities that are, or appear to be, money laundering.

Entertaining and gifts

Promotion and network building make an important contribution to cultivating relations with our customers and partners. Entertaining in the form of gifts and other benefits of modest economic value is permitted, provided this is in line with our ethical guidelines:

- Invitations or travel to or participation in events with suppliers or business associates must be approved by the line manager.
- GK must cover costs relating to travel and participation in supplier events to ensure that these are at arm's length.
- Gifts and entertaining benefits may only have a modest value, for example invitations to traditional industry events, a simple lunch or small gifts.
- Agreements with consultants or intermediaries must never be used to channel payments or other benefits to anyone in order to circumvent GK's rules on bribery and corruption.
- Gifts and other entertaining benefits must be consistent with the recipient's ethical guidelines to the extent we are familiar with these.

Purchasing and suppliers

GK endeavours to establish mutually beneficial relations with our suppliers and subcontractors. We use our size and position to appear as “one GK” to strengthen our competitiveness. Our suppliers must satisfy the same ethical principles as we do. To this end we have a dedicated Code of Conduct for Suppliers. The following applies to GK’s purchasing activities:

- All employees must comply with signed collaboration agreements and applicable purchasing guides.
- GK makes purchasing decisions based on cumulative corporate experience and knowledge, and not personal opinions.
- All purchasing is based on open tenders and GK must not be dependent on individual suppliers.
- GK must not use suppliers who seek to unduly influence GK’s choice of products.
- GK must not use suppliers or subcontractors who have not signed our Code of Conduct for Suppliers and been subject to a supplier evaluation.

How we interact with society

GK aims to build a sustainable society for future generations by:

- ensuring a good indoor environment and contributing to good health, productivity and efficiency
- ensuring optimal energy consumption and a clean environment
- stimulating recruitment and skills development in the sector
- aiming to increase the proportion of women in our company and the sector as a whole
- minimising the negative environmental impacts from our own operations
- taking social responsibility and acting impeccably in all situations

Climate and the environment

GK has set itself ambitious environmental goals and wishes to actively contribute to the green shift, both by reducing our own emissions and by encouraging our customers to choose long-term and sustainable solutions.

GK must as far as possible prevent and continuously restrict undesired impacts on the environment. GK must endeavour to perform all our operations in an environmentally friendly way, and satisfy applicable environmental requirements. This includes reducing emissions to air, the ground and water.

GK’s services, products and processes are optimised to consume energy, resources and raw materials as efficiently as possible, and to minimise the volume of waste and residual materials. GK must avoid materials and methods that pose risks to the environment and climate where other available and viable alternatives exist.

Corporate social responsibility

As a leading player in our specialist area, GK actively participates in societal debates and policy formulation to contribute to the green shift and create a competitive, safe and attractive industry. GK's employees are engaged in different disciplines, research projects and organisational work.

GK enjoys a productive partnership with schools, universities and colleges, and we run courses for technical colleges in all our disciplines. We sponsor and help students with specialist knowledge in one of our areas of interest to write their Master's or Bachelor's dissertation. These dissertations are of major value to us and we often use them in our internal innovation projects.

GK also wishes to contribute to sustainable development outside Scandinavia by providing both funding and expertise for various aid projects. We never give contributions to achieve undue gain or influence.

Implementation and enforcement

On appointment, all employees must confirm that they will follow GK's internal Code of Conduct. Behaviour that violates our Code of Conduct and ethical guidelines may have major consequences for GK and transgressions will therefore be followed up. For employees, this may result in a verbal or written warning or, in severe cases, dismissal and/or legal proceedings or reporting to the authorities.