



# CODE OF CONDUCT

FOR RAMBOLL EMPLOYEES

See more on Ramboll's Intranet: [How to act](#)

**RAMBOLL**

The purpose of this Code of Conduct is to guide you as an employee on how to meet the requirements for responsible business behaviour.

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# CODE OF CONDUCT

**Dear colleagues,**

Since Ramboll was founded responsibility toward customers, society and employees has been an embedded fundamental of Ramboll's business behavior and therefore Ramboll apply a continued focus on responsible business behavior.

As laid down by the Global Commitment<sup>1</sup> Ramboll is committed to acting responsibly towards people, the environment and the economy, and we seek to promote and provide services and solutions that contribute to sustainable development.

Our values - insight, integrity, empathy, enjoyment and empowerment - permeate our efforts on sustainable development and guide our decisions when faced with dilemmas.

Our commitment must inform our behaviour. I therefore ask that all employees respect and proactively contribute to our commitment to internationally recognised principles on human rights, the environment and anti-corruption as we only do clean business. If you identify matters or information concerning our services, solutions, own operations and business relations that are unacceptable given our commitment, each of us has an obligation to act.

Working responsibly is part of being a Ramboll employee, as is our ambition to become a leading sustainable society consultant globally.

**Jens-Peter Saul**

Group Chief Executive Officer  
Ramboll

# PEOPLE

In Ramboll we respect and support internationally proclaimed human rights<sup>2</sup> as stated in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Through our activities we work to avoid causing or contributing to adverse human rights impacts either directly or indirectly, and address such impacts if they occur. In addition Ramboll enables opportunities by contributing positively to the respect and support for human rights with our services, solutions and own operations.

## POLICIES

Our respect and support for human rights is further integrated in our Group policies.



## HOW SHOULD YOU ACT?

You are expected to be aware of our commitment which entails respect and support for human rights.

You must contribute to our respect and support for human rights through your own behaviour.

You are expected to act if you identify potential or actual adverse human rights impacts. This includes adverse impacts on employees, customers, local communities or other potentially affected stakeholders.

Please inform your immediate Manager or Director if ever you identify potential or actual adverse impacts on human rights. Alternatively, inform your QHSE Coordinator or QHSE Manager. In all human rights matters that impact any of Ramboll's employees, HR must be informed. Where potential impacts are obvious or can easily be prevented, you may use your own judgment and take immediate action and inform your immediate Manager.

You are under an obligation to raise any issue of concern or doubt with your management for guidance and direction.

## HUMAN RIGHTS - PRINCIPLES

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### The International Bill of Human Rights<sup>4</sup> (\*incl. The International Labour organisation's Declaration on Fundamental Principles and Rights at work)

1. Right to self-determination (indigenous peoples rights)
  2. Right to non-discrimination\*
  3. Right to work (training, contract and termination)
  4. Right to enjoy just and favourable conditions of work (including equal pay for equal work, a living wage (minimum wage), safe and healthy working conditions, equal opportunity for everyone to be promoted and rest, leisure and paid holidays)
  5. Right to form and join trade unions and the right to strike\*
  6. Right to social security, including social insurance
  7. Right to family life (including protection of mothers before and after childbirth and children's and young people's protection from exploitation (no child labour\*))
  8. Right to adequate standard of living (including adequate food and its fair distribution, adequate clothing, adequate housing and water and sanitation)
  9. Right to health
  10. Right to education
  11. Right to take part in cultural life, to benefit from scientific progress, to material gains from inventions and moral rights of authors (including protection of copyrights)
  12. Right to life
  13. Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment (including free consent to medical or scientific experimentation)
  14. Right not to be subjected to slavery, servitude or forced labour\*
  15. Right to liberty and security of person to humane treatment
  16. Right of detained persons to humane treatment
  17. Right not to be subjected to imprisonment for an inability to fulfil a contract
  18. Right to freedom of movement
  19. Right of aliens to due process when facing expulsion (seeking asylum)
  20. Right to a fair trial
  21. Right to be free from retroactive criminal law
  22. Right to recognition as a person before the law
  23. Right to privacy
  24. Right to freedom of thought, conscience and religion
  25. Right to freedom of opinion and expression (including freedom of information)
  26. Right to freedom from war propaganda, and freedom from incitement of racial, religious or national hatred
  27. Right to freedom of peaceful assembly
  28. Right to freedom of association
  29. Right to protection of the family and the right to marry
  30. Right to protection of the child and right to nationality
  31. Right to participate in public affairs
  32. Right to equality before the law, equal protection of the law and rights of non-discrimination
  33. Rights of minorities (culture, religious practice and language).
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For a better understanding of the human rights contained in the International Bill of Human Rights please read the text of the Covenants<sup>4</sup>.

# ENVIRONMENT

In Ramboll we respect and support internationally recognised environmental principles as stated in the Rio Declaration on Environment and Development.

We work to avoid causing and contributing to adverse impacts through our activities, and address such impacts if they occur. In addition, Ramboll enables business opportunities, by contributing positively to the respect and support for environmental principles with our services, solutions and own operations.

## POLICIES

Our respect and support for environmental principles is further integrated in our Group policies.



## HOW SHOULD YOU ACT?

You are expected to be aware of our commitment to the environment which entails respect and support for internationally recognised environmental principles.

You must contribute to our respect and support for environmental principles through your own behaviour.

You are expected to act if you identify potential or actual adverse environmental impacts. Inform your immediate Manager or Director if ever you identify potential or actual adverse environmental impacts. Alternatively, inform your QHSE coordinator or QHSE Manager. Please inform Facility Management if the impact is related to Ramboll's own activities or offices. Where potential impacts are obvious or can easily be prevented you may use your own judgment and take immediate action and inform your immediate Manager.

You are under an obligation to raise any issue of concern or doubt with your management for guidance and direction.



## ENVIRONMENT - PRINCIPLES

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### In Ramboll we support a precautionary approach to environmental challenges

- We apply environmental risk assessment (hazard identification, hazard characterisation, appraisal of exposure and risk categorisation) risk management and risk communication
- We provide and promote services, solutions and operations that involve energy and waste reduction and resource optimisation to our customers as well as from our own operations
- We strive to balance both short-term and long-term environmental costs and benefits of our services, solutions and operations
- We establish and maintain emergency procedures and plans to reduce and mitigate environmental and health and safety impacts caused by accidents, and to communicate information about incidents to appropriate authorities and local communities to prevent health emergencies and industrial accidents that can affect the surrounding community and have adverse impacts on the environment.

### In Ramboll we undertake initiatives to promote greater environmental responsibility

- We strive to minimise the adverse environmental impacts of our services, solutions and operations through a proactive approach and responsible management of environmental aspects e.g. energy, water, emissions to air, waste, soil contamination, noise etc.
- We demonstrate continuous improvements of the overall environmental performance related to our services, solutions and operations.

### In Ramboll we encourage the development and diffusion of environmentally friendly technologies

- We protect the environment by promoting and contributing with environmentally sound technologies as part of our services, solutions and operations that are less polluting, and use all resources in an efficient way
  - We promote and contribute to green technologies including cleaner production process and pollution prevention technologies as well as end-of-pipe and monitoring technologies.
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# INTEGRITY

In Ramboll we respect the rules of anti-corruption laws e.g. the UK 2010 Bribery Act and we respect and support internationally recognised anti-corruption principles as stated in the United Nations Convention against Corruption and the FIDIC<sup>3</sup> Integrity Management Guidelines.

We avoid causing and contributing to corrupt practices through our activities, and address such incidents if they occur. In addition Ramboll enables business opportunities, by contributing positively to the respect and support for anti-corruption principles with our services, solutions and own operations.

## POLICIES

Our respect and support for anti-corruption principles is further integrated in our Group policies.



## HOW SHOULD YOU ACT?

You are expected to comply with our commitment to Integrity, which entails compliance with the law and respect and support for internationally recognised anti-corruption principles and standards.

You must comply with our commitment through your own behaviour and not participate in or support any form of bribery, corruption or fraudulent practices.

Can an action pass the newspaper test – ask yourself the question: would it damage Ramboll's reputation if the transaction becomes headline news? If yes, the action should not be performed.

You are expected to act if you identify potential or actual corrupt practices. Inform your immediate Manager or Director if ever you identify potential or actual corrupt practices. Alternatively, inform the Legal or Finance Department of any potential or actual corrupt practices. Where potential corrupt practices are obvious or can easily be prevented you may use your own judgment and take immediate action and inform your immediate Manager.

You are under an obligation to raise any issue of concern or doubt with your management for guidance and direction.

## INTEGRITY – PRINCIPLES

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### Corruption and bribery

- We refrain from bribing, or using any other method to unjustly influence public officials, the judiciary, or private parties, including both 'active' and 'passive' corruption - also referred to at times as 'extortion' or 'solicitation'
- We do not permit payment of bribes or trading in influence in relation to business relations, government officials or employees, including through the use of intermediaries.

### Agents and consultants

- The fees we pay to agents and associated consultants shall be fully transparent and commensurately justified with the actual services provided. Further, we must have documentation hereof.

### Anti-Competition

- We do not sponsor or engage in anti-competition arrangements designed to influence or secure consulting work; nor will we seek commissions from suppliers of equipment or services recommended to the customer as part of Ramboll's consulting services
- We do not participate in or support any form of cartels
- We favour quality based selection for contracting of our services.

### Anti-money laundering

- We hold no secret or unrecorded funds of money or assets
- We document, record and keep income and expenditure data available for periods determined by law and, if not regulated for a minimum of three years
- We do not permit or participate in money laundering.

### Confidentiality

- We always act in the legitimate interest of our customers, perform professional services with integrity and faithfulness, and never disclose proprietary or confidential information relating to assignments or to the customer without the customer's prior consent.
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### Conflict of interest

- We avoid any conflict of interest and inform our customer beforehand of any potential conflict of interest that could emerge during the execution of consulting services
- We do not seek personal gain through abuse of our positions in Ramboll
- We do not hire government employees to do work that conflict in any manner with the former official obligations of that employee
- We abstain from nepotism and cronyism.

### Contributions and donations

- We do not make political contributions. We do not make charitable donations and sponsorships in expectation of undue advantages.

### Dinners, entertainment, hospitality, gifts and freebies

- We do not offer or accept excessive dinners, entertainment, hospitality, gifts and freebies above the cumulative value of the equivalent of USD 200/EUR 150 per person/relationship as a general guideline and under the criteria below. However, this amount can be exceeded provided that the criteria below is fulfilled:
    - We only offer or accept dinners, entertainment, hospitality, gifts and freebies for business purposes and never during the process of competitive bid, tender evaluations or contract negotiations
    - Gifts and freebies must not be given in the form of cash or cash equivalent
    - Dinners, entertainment, hospitality, gifts and freebies must not be excessive in value or exceed local business conduct
    - When we offer dinners, entertainment, hospitality, gifts and freebies, this must not violate the rules of the recipient organisation
    - When we accept or offer dinners, entertainment, hospitality, gifts and freebies there must be a balance in the relationship - the recipient should be able to match the level of value
    - We never offer or accept dinners, entertainment, hospitality, gifts and freebies in secret only in full transparency
    - It is approved by the Principal Business Unit (PBU) Management.
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### Facilitation payment

- We do not permit the use of facilitation payments – they are illegal under laws in different countries where we operate for example the UK 2010 Bribery Act. If such a payment under extreme circumstances has been made, it must be reported without delay to the Managing Director of your Principal Business Unit (PBU) describing the facts and persons involved (for example if you were subject to threats or otherwise coerced). Threats that have occurred without having to make any payment must also be reported.

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### Impartiality

- Our professional advice, judgments and decisions are impartial
- We do not offer nor accept remuneration of any kind which in perception or in effect either:
  - a) seeks to influence the process of selection or compensation of consultants and/or their customers, or
  - b) seeks to affect the consultant's impartial judgment
- We cooperate fully with any legitimately formed investigative body inquiring into the administration of any contract or services or construction.

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### Tax

- We comply with tax laws in all countries in which we do business. We do not engage in aggressive tax planning and we do not use transfer pricing as a means of avoiding tax payments in any country.
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# OUR APPROACH

In Ramboll we operationalize respect for the principles by implementing processes in line with the UN Guiding Principles on Business and Human Rights and the FIDIC<sup>3</sup> Integrity Management Guidelines.

The processes for responsible business behaviour will guide you on what you need to be aware of in assisting Ramboll to comply with our commitment to internationally recognised principles on human rights, the environment and anti-corruption.

## POLICIES

The required processes for Ramboll to manage potential and actual adverse impacts and enable opportunities for human rights, environmental, and anti-corruption principles is further integrated in our Group policies and procedures.



## HOW SHOULD YOU ACT?

You are expected to be aware of our commitment to responsibility, which entails the implementation of processes that are in line with international principles and guidelines.

You are expected to assist Ramboll in implementing the processes by:

- Proactively communicating Ramboll's Global Commitment<sup>1</sup> to business relations and stakeholders where relevant
- Reporting identified potential or actual adverse impacts on human rights, the environment and anti-corruption that Ramboll caused or contributed to as well as adverse impacts that may be directly linked to our services and solutions by our business relations
- Participating in making use of Ramboll's leverage to influence the business relation in question to address the potential or actual adverse impact.

You are under an obligation to raise any issue of concern or doubt with your management for guidance and direction.

## OUR APPROACH - PROCESSES

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### Global Commitment

- We align company policies and procedures with our Global Commitment
- We incorporate our Global Commitment into our core strategies and business operations
- We undergo training in our Global Commitment
- We communicate our Global Commitment internally as well as externally, and directly to:
  - Business relations with which we have contractual relationships, e.g. customers
  - Business relations directly linked to our projects, e.g. consortium partners
  - Potentially affected stakeholders where we identify potential or actual adverse impact.

### Risk and opportunity management

- We apply a process of continuous risk and opportunity management according to our risk profile, industry, size and geographic coverage and integrated in our operations
  - We always apply a thorough risk and opportunity management process when entering new markets, new services or acquiring new businesses
  - The risk and opportunity management process consists of the following four elements:
    - Identification - we assess and identify potential or actual adverse impacts and opportunities in relation to our services, solutions and own operations
    - Prevention and Mitigation - we integrate the findings from the assessment across relevant functions and processes and take appropriate action
    - Verification - we track the effectiveness of the actions taken
    - Accounting - we report and communicate how adverse impacts and opportunities are addressed.
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### Business relations

- We encourage our customers, suppliers and business partners to share our ambition to respect and support sustainable development
  - We expect our Global Commitment to be known and acknowledged by any company acting on our behalf (e.g. agents) including consortium and joint venture partners on joint projects or joint operations
  - We expect all suppliers, sub-consultants and consortium partners on joint projects to comply with the standards of business behaviour as laid down in the Ramboll Suppliers' Declaration
  - We will try to use our leverage as a company to influence and encourage business relations to demonstrate respect for human rights, the environment and anti-corruption
  - We should increase our leverage in instances where it is insufficient in creating change among business relations that are causing or contributing to adverse impacts. When adverse impacts continue to take place, we should consider ending the relationship.
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# WHISTLEBLOWER

An important tool to uphold Ramboll's commitment to acting responsibly is the Whistleblower service which is a direct and anonymous reporting line to an external independent investigator.

You are encouraged to take up any irregularities with the relevant people, but as a last resort, if other reporting lines do not work or you are uncomfortable with the situation, please use the Whistleblower service to report on any illegal acts, breaches of contract or Code of Conduct.

You can find the link to the Whistleblower service on the Intranet/How to act.

# INTERNATIONAL PRINCIPLES AND LEGAL COMPLIANCE

The provisions as set out in this Code establish requirements for Ramboll and its employees. These requirements rest on the international principles expressed by the UN Global Compact, with reference to the International Bill of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption. The principles are translated into actions through the management system described by the UN Guiding Principles on Business and Human Rights and the FIDIC Integrity Management Guidelines. Furthermore, the Code is informed by the OECD Guidelines for Multinational Enterprises, 2011 Edition.

In addition to meeting the requirements of the Code, every employee shall assist in ensuring that Ramboll complies with national regulations wherever we operate. Where differences between the terms of the Code and national regulations occur, Ramboll employees shall seek the best way to honour the Code while adhering to the law. When an employee experiences conflict between provisions of the Code and national regulations they must alert the Legal Department where the most appropriate course of action will be agreed ensuring respect for the international principles outlined above.

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## NOTES

- 1 The Global Commitment is available on Ramboll's Intranet: How to act
- 2 Including labour rights
- 3 International Federation of Consulting Engineers
- 4 <http://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>  
<http://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>  
<http://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>  
<http://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>





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