

Last updated September 2023

# Code of Conduct

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# Introduction to Viegand Maagøe

**We help our customers and partners accelerate their businesses through solutions and changes that support the creation of more sustainable societies.**

**Today and tomorrow.**

Since 2006 we have built a solid foundation of experience in developing business opportunities based on sustainability and ESG and adding our deep insights, competencies, and our unique interdisciplinary approach.

That is why we, together with customers and partners, create innovative solutions. We could also call them sustainable.

We strive to become the leading sustainability and ESG advisors in the Nordic countries. We allow ourselves to have that ambition because we work together to develop our own skills, our customers' businesses, and the solutions of a more sustainable society. We believe that this can only happen if we, at the same time, can create a balanced life as consultants.

## Our values

Viegand Maagøe operates within the framework of regulatory, ethical, and professional standards, and our code of conduct is based on our core values:



### Holistic

We employ our interdisciplinary competencies by listening, questioning, and learning. We believe that a holistic approach creates the best solutions for our customers – as well as for society, the environment, and the climate.



### Integrity

We keep our promise, and our partners can trust that we are a good and loyal partner. Our customers must experience that we always handle projects and situations well.



### Professionalism

We employ our deep expertise knowledge in projects, in our consultancy and in our solutions. We share our knowledge internally and externally, and we continually seek to increase our knowledge.



### Sustainability

We are working towards sustainability – environmental, economic, and social on a local and global scale. Supporting the green transition is at the core of our purpose.

# The 10 Principles of the UN Global Compact

**Viegand Maagøe has joined the UN Global Compact and is committed to following the 10 principles of responsible business conduct that form the basis of the UN Global Compact. We always aim to reflect these principles in our internal code of conduct, as well as through the projects and partnerships we are involved in.**



## United Nations Global Compact

The principles provide a common ethical and practical framework for corporate responsibility and are based on international conventions and agreements. For example, the OECD guidelines, ILO conventions on labour rights, the UN Guidelines on Human Rights and Business and the Rio Declaration are all represented in the principles.

These principles thus provide the framework for our Code of Conduct and reflect the requirements and expectations we have towards our partners and suppliers.

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### Human rights

1. We support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses.

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### Labour

3. We uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labour;
5. the effective abolition of child labour; and
6. the elimination of discrimination in respect of employment and occupation.

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### Environment

7. We support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.

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### Anti-corruption

10. We work against corruption in all its forms, including extortion and bribery.

# Before reading our Code of Conduct

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## Definitions

**Viegand Maagøe** covers the entire company and all its employees, including part-time employees, project employees, temporary workers, and trainees, as well as locations and offices registered at the company's addresses.

**Partners** are companies (and their employees) or individuals who, as subcontractors, work for or together with Viegand Maagøe or who supply goods, products or services to Viegand Maagøe.

In the case of projects and collaboration agreements where Viegand Maagøe acts as adviser or sub-adviser, we will familiarise ourselves with any documents of the company we work for or with outlining accountability and integrity such as a Code of Conduct.

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## Reading instructions for this Code of Conduct

This Code of Conduct provides the framework for the rules and guidelines which make up the internal code of conduct for Viegand Maagøe. In other words, how we, as a company, conduct business behaviour and how we expect employees at all levels of the organisation to act in different situations.

The following describes the principles we follow in Viegand Maagøe, as well as what each of these means for our partners. All principles are based on UN Global Compacts 10 principles.

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## General information on compliance with this Code of Conduct

An employee or partner may experience situations or incidents which are not described in this Code of Conduct. We therefore encourage all our employees and partners to exercise sound judgment and always seek advice and guidance on proper business conduct when in doubt.

## National and international legislation

Partners shall comply with existing laws, rules, standards, and regulations at all times in the country or countries in which they have business activities, and which regulate the work and/or services provided to Viegand Maagøe. To the extent that applicable laws or rules are more restrictive than this Code of Conduct, these laws or rules shall prevail.

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## Confirmation of this Code of Conduct

Viegand Maagøe integrates the requirements and expectations we have of our business partners into contracts to be signed by the business partner in question. In addition, we incorporate due diligence of suppliers based on self-reporting to the extent we deem it necessary. The purpose is to assess whether the business partner meets the requirements of our Code of Conduct.



**Søren Eriksen**  
CEO  
Viegand Maagøe A/S



# We respect human and worker rights

**Viegand Maagøe supports and respects the protection of international proclaimed human and labour rights within our sphere of influence.**

We also expect our partners to offer their employees working conditions that meet internationally stated human and labour rights and standards.

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## Health and safety at work

### Our principles

Viegand Maagøe commits to a high standard of working conditions and safety. We respect that all employees have the right to a working environment where no one is exposed to safety or health risks or dangers in relation to their work.

We strive to promote and create a preventive health and safety culture and to establish effective actions in the field of health and safety. This applies to both physical as well as mental health and safety for all employees regardless of job characteristics.

### What does this mean for our partners?

Partners must create a working environment consistent with internationally declared human rights. Partners must seek to minimise and manage incidents and accidents at work as well as to provide necessary and maintained safety and protection equipment to all employees.

## UN Global Compact principles in focus

### Human rights

1. We support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses.

### Labour

3. We uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labour;
5. the effective abolition of child labour; and
6. the elimination of discrimination in respect of employment and occupation

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## Wages and overtime

### Our principles

Viegand Maagøe complies with applicable laws and regulations on pay, working hours and overtime, and we schedule the workload in such a way that possible overtime is limited to a level that allows a fair balance between work and leisure time for the employee.

### What does this mean for our partners?

Partners must specify working hours, wages, overtime payments and the employee's entitlement to leave in accordance with the laws and regulations in force in the country or countries in which they conduct business. Partners must comply with any applicable minimum wage rules.

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## Freedom of association

### Our principles

Viegand Maagøe respects the right of all employees to organise themselves as they choose, as well as the right to collective bargaining and to be members of peaceful associations, including trade unions.

### What does this mean for our partners?

Partners must recognise the right of their employees to join and/or establish an association, including a trade union.

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## No forced labour

### Our principles

Viegand Maagøe respects the right of all workers to freely choose their job/occupation, and we accept no form of slavery or forced labour.

### What does this mean for our partners?

Partners must not employ workers on compulsory contracts, through slavery or through other forms of work carried out against a person's will or wish.

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## No child labour

### Our principles

Viegand Maagøe does not accept any child labour in the company or in our value chain. We refer to the regulations for the employment of young persons under the age of 18 defined by [The Minister for Employment in Denmark](#).

### What does this mean for our partners?

Partners must not make use of child labour and shall comply with the statutory minimum requirements in relation to age in force in the country or countries in which they operate.

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## No discrimination and equal rights for all

### Our principles

Viegand Maagøe strives to create a safe working environment free of discrimination and harassment for our employees, and we offer equal employment opportunities for everyone. We respect and encourage open dialogue to create a working environment that supports diversity, equality, and inclusion.

We do not tolerate any forms of discrimination, harassment, bullying or disrespectful behaviour among employees. This applies regardless of whether it is based on an individual's race, ethnicity, colour, age, sex, gender identity or expression, sexual orientation, political beliefs, nationality, national or social origin, language, religion, disability, or other characteristics which do not relate to the person's qualifications or the requirements of the job.

### What does this mean for our partners?

Partners must create a working environment free of all forms of harassment, discrimination, and bullying. Partners must not discriminate in their recruitment practices.



# Responsibility for climate and the environment

**Viegand Maagøe works to promote the green transition among customers and society in general. At the same time, we take measures to promote environmental responsibility in our own company, and we work to minimise the direct and indirect negative climate impact of our activities through concrete reduction measures.**

We also expect our partners and suppliers to identify and manage climate and environmental impacts from their business and activities in the company as well as in its value chain.

## UN Global Compact principles in focus

### Environment

7. We support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.

## Climate and environmental responsibility

### Our principles

We measure and report our CO<sub>2</sub> emissions in Scope 1, 2 and 3 on an annual basis, and we have set concrete reduction targets in line with the UN Paris Agreement. Since 2022, we have been Science Based Targets-validated. We are working determinedly on several reduction measures to minimise our carbon footprint.

Our climate targets:

- Scope 1 and 2  
50 % reduction of CO<sub>2</sub> emissions by 2030 compared to 2019
- Scope 3  
30 % reduction of CO<sub>2</sub> emissions per employee in 2030 compared to 2019

### What does this mean for our partners?

We expect our partners and suppliers to identify and manage the climate and environmental impacts of their business and activities in the company as well as in the value chains.

This implies that partners take responsibility for minimising greenhouse gas emissions and that they are committed to promoting environmental responsibility,

efficient waste management and responsible use of natural resources. In addition, we expect partners to comply with applicable legislation and standards relevant to climate and environmental activities and impacts in the country or countries where they have business activities.

Viegand Maagøe always aim to engage in dialogue and collaboration with relevant suppliers on alternative materials as well as data collection with relevance for our Scope 3 emissions, among other things.





# We support integrity and transparency

**Viegand Maagøe works to maintain the highest standards of integrity and work ethics in all our activities.**

We have a zero tolerance-policy towards corruption and bribery in all forms, which we see as crucial to being able to conduct business responsibly and to ensure continued confidence in our activities. We also expect our partners to comply with the same standards in terms of integrity and ethics.

## Zero tolerance of corruption, including extortion and bribery

### Our principles

Viegand Maagøe does not accept any corruption or bribery. Invitation, acceptance, offer or promise of payment of bribery or other unlawful payment practices are strictly prohibited, whether directly or through a third party. We do not carry out any activities or acts contrary to applicable financial sanctions or provide services that help clients to violate applicable sanction laws.

Viegand Maagøe defines bribery as a payment, gift or other benefit intended to induce someone to do or refrain from doing something that is illegal or contrary to their duties.

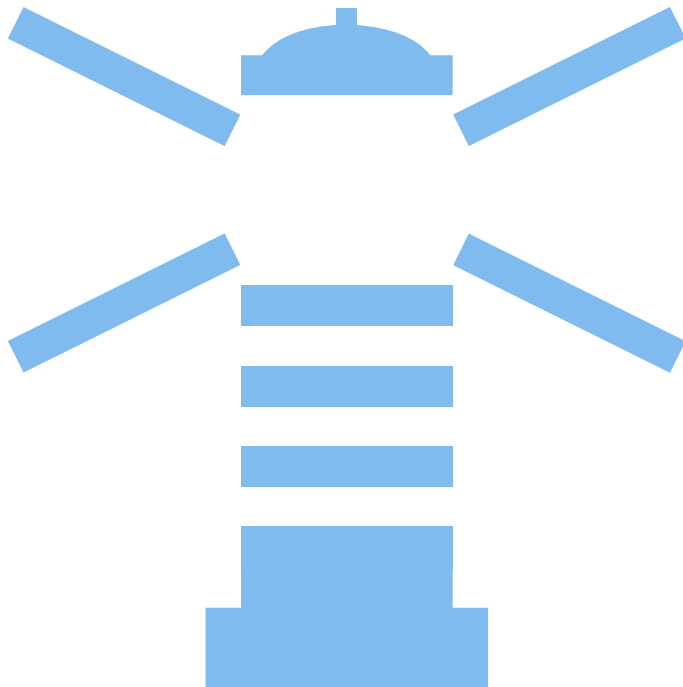
### What does this mean for our partners?

Partners must not be involved in or channel funds for corruption, bribery or act in violation of applicable laws and rules concerning sanctions when working for or with Viegand Maagøe. Similarly, partners must not provide any services or form arrangements that can cause Viegand Maagøe's direct or indirect involvement in corruption, bribery or other illegal activities.

## UN Global Compacts principles in focus

### Anti-corruption

10. We work against corruption in all its forms, including extortion and bribery



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## Fair competition

### Our principles

Viegand Maagøe aims to run a competitive business and ensure that competition never results in the infringement of existing legislation. We refer to the EU competition law and the Danish Competition Act, which contains three general prohibitions:

- the prohibition of cartels and coordination with competitors restricting competition in the market, including agreements on prices, discounts or conditions of business, market and customer sharing and the coordination of offers;
- the prohibition of restrictions on contracts with customers or suppliers
- the prohibition on abuse of a dominant position and market power

### What does this mean for our partners?

Partners must refrain from any form of unlawful competition under the existing competition law of the country or countries in which they have business activities, both alone and in collaboration with other companies or individuals.

Specifically, partners must not, formally or informally, conclude any agreements which unlawfully limits competition. Moreover, they must not determine prices, business conditions, benefits, customers, markets, or services on behalf of Viegand Maagøe or by other means in connection with any relation to Viegand Maagøe.

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## Confidentiality and data protection

### Our principles

Viegand Maagøe processes information related to or belonging to, our employees, customers, partners, or others with whom Viegand Maagøe collaborates, with maximum confidentiality and in accordance with applicable legislation, including GDPR.

Viegand Maagøe protects information and data entrusted to us through information security controls.

### What does this mean for our partners?

Partners must comply with existing laws on the processing of personal data, including GDPR legislation, thereby respecting the right of employees, customers and business partners to protect personal data when the company collects and stores them.

Partners must manage and disclose personal data and other confidential information to which they have been given access in connection with their work with Viegand Maagøe, in accordance with the guidelines received from Viegand Maagøe and in accordance with applicable laws and regulations.

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## Responsible marketing practices

### Our principles

Viegand Maagøe wishes to communicate in a transparent and credible way to avoid misleading the recipients of this communication. This applies to all channels of communication, including social media, advertisements, and general communication on our website. We comply with the Danish Marketing Act, including the Danish Consumer Ombudsman's guidance on the use of environmental and ethical claims, etc. in marketing.

### What does this mean for our partners?

When the partner uses or refers to Viegand Maagøe in any form of external communication and marketing, we expect the partner to familiarise themselves with and comply with applicable marketing legislation in the country or countries in which it markets.

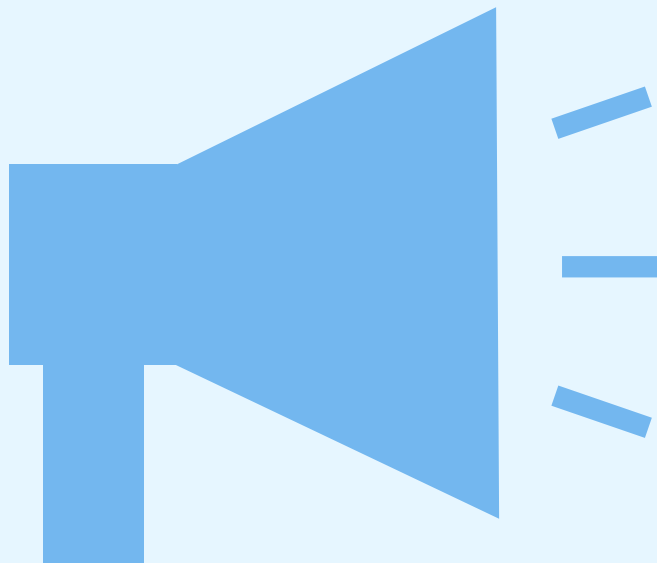
# Own it and Speak-up

## **If you experience an incident in conflict with this Code of Conduct**

Viegand Maagøe expects employees as well as partners to report any discrepancies and violations of this Code of Conduct or existing laws and regulations that the employee or partner may experience or may be exposed to.

Does something **feel wrong**, or do you doubt whether a situation or incident is in accordance with the Code of Conduct and values of Viegand Maagøe?

By **speaking up** when something seems wrong, we can prevent mistakes and wrongdoing, and we can demonstrate our integrity and that we have the courage to **do the right thing**.



### **Therefore**

Pick up the phone. Send an e-mail. Plan a meeting. Own it and Speak-up if you are experiencing an incident in conflict with this Code of Conduct!

# Own it and Speak-up

## Own it

We all have a responsibility to report and express our concerns on an honest, transparent, and fair basis regardless of our level or role of the company. We want every employee, customer, business partner or other stakeholder to know that their concerns are heard and handled in a fair and professional manner at Viegand Maagøe.

## Speak up

Is something wrong? Are you in a dilemma? Ask yourself:

- Is this legal?
- Is this in line with our guiding principles for responsible business conduct laid out in this Code of Conduct?
- Will this action have a negative impact on my colleagues, on Viegand Maagøe or on a third party?

Discrepancies/violations may be reported anonymously, and no employee or partner will be subject to reprisals when reporting an incident in good faith.

## Who should you contact?

Viegand Maagøe calls for discrepancies and infringements to be reported through one of the following channels:

### As an employee

- Nearest manager or HR in Viegand Maagøe
- Viegand Maagøe's whistleblower programme

### As external

- Contact person or project manager at Viegand Maagøe
- Louise Ringtved Futtrup, leader of HR.

Viegand Maagøe evaluates reported discrepancies/infringements and, where appropriate, involves internal and external parties to the necessary extent.

## You can always reach out

### Louise Ringtved Futtrup

Head of HR

lrf@viegandmaagoe.dk

+45 20 16 17 15



A blue speech bubble with a white border and a tail pointing downwards and to the right. The text "Viegand Maagøe" is written in white inside the bubble.

Viegand  
Maagøe