

Business Integrity policy

Ramboll is committed to conducting business transparently, fairly and in compliance with all applicable laws and regulations where we operate. This policy sets the overarching expectations for acting with integrity and compliance across all operations globally.

Business Integrity

Business Integrity in Ramboll is built on trust earned through consistent actions, transparent decisions and a commitment to doing what is right - also when no one is looking. Our reputation is shaped by how we deliver to our clients and how we conduct ourselves every day. Our integrity standards are embedded in our Code of Conduct and further elaborated in our global Policies and Procedures.

Complying with Laws and Regulations

Ramboll is committed to comply with all applicable regulations where we operate, and we will not pursue or continue engagements prohibited by law.

Due to our global reach, size and scope of our operations, we operate in an environment where we must continually comply with the following global and local regulations related to the business integrity agenda in Ramboll:

- Anti-corruption and -bribery
- Sanctions and export controls
- Human rights due diligence
- Whistleblower and Speak Up

Ramboll implements regulatory compliance programmes in accordance with internationally recognised standards and guidelines, such as the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, UN Guiding Principles on Business and Human Rights, as well as regulatory requirements locally and internationally.

Due diligence, risk and monitoring

A key component of our regulatory compliance programmes is our risk-based due diligence and monitoring. We evaluate the compliance risk and integrity standards of our clients, supply chain, and activities with extra caution and diligence applied in high-risk countries and sectors. Our risk and due diligence approach is supported by built-in controls that trigger proportionate reviews and approvals.

We systematically monitor our integrity and compliance programmes to drive continuous improvements.

Building a Culture of Compliance and Integrity

As truly successful compliance programmes rely on a healthy business integrity culture, all employees are responsible for upholding our integrity standards. Leaders have an additional responsibility for enforcing integrity standards in their teams and must serve as role models by consistently demonstrating compliance and integrity in their behaviour. Ramboll provides employees with regular training, guidance, tools and procedures to support daily decision making.

Governance

The Group Executive Board sets direction and approves ambition and funding, while the Senior Group Director for Business Integrity owns and maintains the global compliance and regulatory programmes, and provides regular reporting on business integrity and compliance risks and performance to the Audit & Risk Committee and the Group Executive Board.

Consequences of non-compliance

Our risk tolerance to business integrity and compliance risks can be expressed as follows:

- No tolerance to violations of laws related to the business integrity agenda
- No tolerance to fines or criminal convictions of any Ramboll entities related to business integrity.

No tolerance to wilful circumvention of Ramboll's business integrity controls by employees.

Failure to follow the policy may lead to disciplinary action, up to and including dismissal, and in some cases may expose Ramboll or individuals to civil or criminal liability and may be reported to the authorities if required by law.