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RAMBOLL REPORT ON THE SUPPLY CHAIN DUE DILIGENCE ACT (SCDDA / LKSG)

Table of Content

- INTRODUCTION 3**
 - Reporting period and material scope 4
 - Ramboll's organisational structure and operational business areas 4
- STRATEGY & ANCHORING 5**
 - Setting up risk management 5
 - Ramboll Declaration of Principles on Human Rights Strategy 5
- RISK ANALYSIS AND PREVENTION MEASURES 6**
 - Implementation and procedure 6
 - Carrying out a risk analysis 6
 - Prevention measures 6
 - Communicating the results 6
- IDENTIFY VIOLATIONS AND TAKE CORRECTIVE ACTION 7**
- ESTABLISHMENT OF COMPLAINTS PROCEDURES 8**
 - Access to the complaints procedure 8
 - Requirements for the complaints procedure and responsibilities 9
- SUPPLY CHAIN MANAGEMENT DOCUMENTATION AND REPORTING 10**
- CONCLUSION 11**
 - Summary of the main findings and measures 11
 - Final words 11

Introduction

Dear Reader,

With this report, we, the Ramboll Deutschland Group, account for our current financial year until October 2024 and the activities undertaken therein, in accordance with the requirements of the Supply Chain Due Diligence Act (LkSG), in order to meet our responsibility for human rights and environmental protection along our supply chains.

As an international consulting firm, we are aware of the essential importance of strategic risk management and a clear anchoring of due diligence obligations within our organization. We see it as our duty to be proactive in our own business and in all aspects of our supply chain to identify, mitigate and, if possible, prevent risks altogether.

In the course of this, we take measures to continuously improve our internal management systems and to ensure compliance with both human rights and environmental protection in the long run. Our approach is based on previous experience and the continuous development of our strategies and operational approaches.

We hereby present our report, which not only contains a description of the actions undertaken, but also reflects our determination and ambition to implement the goals of the LkSG. For further information and insights into our corporate strategy as well as ongoing efforts in the area of sustainability and corporate social responsibility, please refer to our [Sustainability Report](#) and our [Diversity Report](#).

Best regards,

Stephan Degl,
LkSG representative
Ramboll

Reporting period and material scope

In our report on the Supply Chain Due Diligence Act (LkSG), we cover the year up to October 2024. This period includes all relevant activities and developments of the Ramboll Deutschland Group (hereinafter referred to as Ramboll) in relation to our due diligence obligations in the supply chain.

We focus on the following areas:

- Setting up a risk management system
- Risk analyses and preventive measures in our own business area as well as at direct suppliers.
- Identify any due diligence violations during the reporting period and take subsequent corrective action.
- Setting up a complaints procedure

The objective view is based on our business activities and the direct and indirect interaction with our suppliers. This includes the assessment of risks with regard to human rights and environmental aspects and includes all measures we have taken to address these risks.

Ramboll's organisational structure and operational business areas

Ramboll operates according to a matrix organizational structure that allows different business units (e.g., engineering, environmental consulting, infrastructure development, architecture) and central functions (such as human resources, quality management, and procurement) to work cooperatively and in a coordinated manner, both locally and globally. The units are obliged to pursue a uniform central corporate strategy that applies to all locations and to align their activities accordingly.

For the implementation of the strategy with regard to the Supply Chain Due Diligence Act, Ramboll has set up special functions or roles that are responsible for operational implementation in specific areas, such as the purchase of goods and services and other business-specific sectors. Internal departments such as Business Integrity support and monitor compliance with the relevant requirements.

To ensure that the strategy is effectively integrated into operational operations, a corresponding guideline exists that covers relevant roles and responsibilities, processes and procedures. Ramboll has its own Code of Conduct (insert LINK) for suppliers and partners and a separate Code of Conduct (insert LINK) for employees, which are binding on all parties involved and are monitored by an internal team. Subject matter experts from various fields such as sustainability, legal, risk management, and human resources are available to address specific topics and challenges.

The risk analysis is carried out on a regular basis in order to assess human rights and environmental risks within the company's own business area as well as with direct suppliers and to take appropriate preventive measures. In the future, these risk analyses will be carried out regularly with the help of the supplier management system, which has yet to be introduced, and will be incorporated into the ongoing monitoring and evaluation of the company's processes.

Strategy & Anchoring

Setting up risk management

The establishment of risk management and the responsibility of the management at Ramboll in terms of strategy and anchoring can be illustrated with the following main aspects:

1. Responsibilities for monitoring risk management: According to Section 4 (3) of the LkSG, internal responsibilities for compliance with corporate due diligence obligations must be defined. In the report presented, a LkSG representative was appointed for Ramboll, who reports directly to the management and monitors compliance with the LkSG at Ramboll and affiliated companies.
2. Reporting process to senior management: A process is established to ensure that senior management is regularly informed – at least once a year – about risk management monitoring activities. The LkSG representative reports personally on a quarterly basis and explains current developments and events in the implementation of the LkSG.
3. Risk analysis and reporting: The annual report of the LkSG representative includes the results of the risk analysis for the company's own business unit as well as for its direct suppliers, including the measures derived from it and implemented.
4. Integration of the human rights strategy: The human rights strategy has been anchored within the organization and in relevant business processes, such as in the areas of human resources/HR, environmental management, purchasing/procurement, among others.
5. Declaration of Principles on the Human Rights Strategy: The Declaration of Principles includes several elements, including the establishment of a risk management system, annual risk analyses, the anchoring of preventive measures, the communication of human rights and environment-related expectations to employees and suppliers, and the documentation and reporting obligations.

Ramboll Declaration of Principles on Human Rights Strategy

As a global company, Ramboll can theoretically violate, contribute to, or be associated with human rights, either on its own or in the context of business relationships. We are aware of these potential impacts and are committed to ensuring that human rights are respected throughout the company, in our supply chain and also in our work on customer projects.

We do not take on projects that pursue aggressive, destructive or oppressive purposes towards nature or people. Ramboll respects human rights in line with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Our commitment to respect human rights encompasses all the rights and principles listed in the International Charter of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its 10 Core Labour Standards.

In the [Ramboll Group's Human Rights Policy](#) this obligation is explained in more detail.

Risk analysis and prevention measures

The risk analysis and related prevention measures for Ramboll were carried out during the reporting period as follows and the results were found as follows:

Implementation and procedure

For the company's own business unit and direct suppliers of goods and services, an initial risk analysis was carried out, which refers to the period from January 2024 to October 2024. The risk analysis was carried out on the basis of systemically relevant evaluations of the direct suppliers used in the mentioned period (location --> Germany, EU, Europe, Asia, Americas, Africa, Middle East) as well as the categorization of the purchased services/products.

Carrying out a risk analysis

The analysis in the company's own business unit showed that the potential risks can already be reduced by implementing a supplier management system.

Various risks were identified for direct suppliers, such as location risks (China or Taiwan).

Prevention measures

A supplier management system will be introduced globally.

With the introduction of the supplier management system, suppliers are obliged to accept and sign our General Terms and Conditions as well as our Code of Conduct (Business Associate Code).

A check of new suppliers for violations and any signs of possible misconduct is carried out by means of a plausibility check in the supplier management system (e.g. sanction check).

Special due diligence procedures in the supplier management system are queried, such as certifications.

Training courses are planned in relevant business areas to raise awareness of basic human rights and environmental obligations.

Furthermore, support for suppliers to prevent and minimise risks, e.g. through supplier training for high-risk suppliers, is being considered.

If violations are detected, remedial measures are determined in cooperation with the suppliers, which must be verified by concrete evidence (e.g. certificates).

Communicating the results

As soon as the results of the risk analysis are available, they are shared with the decision-makers. A condensed overview will be published on the Ramboll website.

Identify violations and take corrective action

The determination of violations in one's own business area can be determined by the following procedures:

Evaluation of reports via the accessible reporting/complaint channels set up in the company.

The determination of violations and remedial actions with respect to direct suppliers can be determined by the following methods:

At Ramboll, both potential and existing suppliers are screened.

Screenings are carried out at potential suppliers in order to clarify in advance whether Ramboll can or wants to enter into a supply relationship with the company.

In the future, potential suppliers will be screened using the questionnaire in the supplier management system.

Any violation of the Ramboll Code of Conduct for Suppliers and Partners (Business Associate Code + Annex) must be remedied by the supplier.

The effectiveness of agreed remedial measures is verified by means of evidence (e.g. certificates) of the remediation of the identified non-compliances. Furthermore, it is mentioned that in the case of new direct suppliers, there must be no violations at the beginning of a contractual relationship, or that these must be remedied within a specified period of time.

Establishment of complaints procedures

The complaints procedure established by Ramboll, ([Whistle-blower](#)) is publicly available and makes it possible to provide information on human rights and environmental risks and violations of human rights or environmental obligations in its own business area as well as with suppliers used by Ramboll in the supply chain. The procedure is to be carried out via the [Ramboll Website](#) accessible. The rules of procedure and the procedure are publicly available.

The complaints procedure ensures the protection of whistleblowers from discrimination or punishment (reprisals). Internal policies prohibit exposing people who make complaints to reprisals. For example, transfers, warnings, dismissals or other disciplinary measures based on a complaint are inadmissible.

The Business Integrity department examines the complaints received and coordinates the processing with the responsible divisions. Rapid admission and processing as well as appropriate communication with the complainant are ensured.

Persons involved in the proceedings offer the guarantee of impartial action, are independent of instructions and are obliged to secrecy.

Access to the complaints procedure is publicly accessible to everyone.

The appeal procedure is reviewed regularly and on a case-by-case basis for its effectiveness and accessibility. The adequacy and effectiveness of risk management will be reviewed on a regular basis, with due regard to the rights of workers, the supply chain and other stakeholders.

The specific processes and measures as well as the implementation of the complaints procedure include:

- Anonymous complaint filing or by an authorised person or association
- Duty of confidentiality for the persons entrusted with the implementation
- Protecting identity with the use of pseudonyms where relevant
- Compliance with current data protection regulations

Access to the complaints procedure

The internal complaints procedure is accessible to all potentially affected parties, takes whistleblowers into account and guarantees, for example, anonymity throughout the entire process.

The grievance process at Ramboll is designed to provide a structured way for stakeholders and employees to raise concerns or complaints regarding the projects, services, or employee behaviour. The following is general information about Ramboll's complaints procedures.

1. Establishment of a complaints procedure:

Ramboll has established a formal complaints procedure that allows individuals to raise their complaints in a manner that is fair, transparent and impartial.

Setting up specific channels for complaints or requests, which can be accessed via a web form or email address.

2. Access to the complaints procedure:

Ramboll ensures that the grievance process is easily accessible to internal and external stakeholders. This includes clear information on how and where complaints can be filed.

Information about the complaints procedure is usually available via the company website, internal documents or on request.

3. Public accessibility:

It is important that the procedure is visible and available to all those who wish to use it and is available in the relevant languages.

Information on how to lodge complaints and participate in the process is made publicly available on the website, where it is easy for those affected to find.

4. Confidentiality and anonymity:

Ramboll offers the possibility to treat complaints confidentially or anonymously in order to protect personal rights and avoid possible retaliation.

5. Process and feedback:

The complaints procedure includes a clear description of the steps Ramboll takes in dealing with complaints.

6. Review and participation:

It is not uncommon for a decision review procedure to be part of the process, so that if complainants are not satisfied with the outcome of the appeal, they can request a further review.

Requirements for the complaints procedure and responsibilities

At Ramboll, the grievance procedures are designed to be transparent, accessible and fair. Here is general information about these procedures:

1. Access to the complaints procedure:

Ramboll ensures that all relevant stakeholders are informed about the complaints procedure.

Information about the procedure is usually available on the company website or via the intranet for employees.

The procedure should be accessible to all and minutes or decisions could be made public, as far as data protection regulations allow.

2. Requirements for the appeal procedure:

The process is clear and straightforward, so that those affected understand how and where to file a complaint.

All complaints will be handled in a way that respects the confidentiality of the information.

The procedure ensures that the symptoms are treated promptly and effectively.

3. Responsibilities:

The Business Integrity Department is responsible for managing the grievance process.

These responsibilities include accepting complaints, investigating cases, and communicating with complainants.

Areas of responsibility can be differentiated according to location, project or business area.

Supply chain management documentation and reporting

At Ramboll, a complaints procedure is an important part of the quality and service orientation. The process is designed to ensure that customers and stakeholders have a formal opportunity to express their dissatisfaction and that these complaints are dealt with effectively and fairly. Here is some general information about this process:

Access to the complaints procedure: The complaints procedure is usually accessible to all customers and stakeholders via the company website. Information on how to file a complaint is publicly available.

Requirements: The procedure specifies that complaints are submitted via the Ramboll website using the whistleblower functionality.

Responsibilities: The company has the Business Integrity Department, which is responsible for receiving and processing complaints.

Evidence and documentation: The company keeps records of all complaints received, their handling and the results achieved. This documentation can be used for internal audits, to improve processes or as proof to regulatory authorities.

Conclusion

Summary of the main findings and measures

Existing as well as planned structures and processes at Ramboll will strengthen prevention and enable the immediate remediation of incidents after they become known.

As part of the risk analyses, risk suppliers have been or are being identified with regard to risk locations. Ramboll confirms that the results of the risk analyses are communicated internally to relevant decision-makers.

In order to raise expectations of suppliers, the General Terms and Conditions are currently being amended and the Code of Conduct (BAC) is being expanded with an annex.

The effectiveness of the remedial measures is regularly reviewed, and no contractual relationships are entered into with potential suppliers where violations have been identified that cannot be remedied or cannot be remedied in time.

The points mentioned in this report reflect the measures implemented and planned to mitigate risks and improve compliance with human rights and environmental standards in the supply chain.

Final words

The information provided and steps listed in this report show that Ramboll is continuously working to improve compliance and monitoring in its supply chain, with a particular focus on prevention, risk management and transparency. Ramboll's management has expressed its responsibility to comply with the Supply Chain Due Diligence Act by appointing an LkSG officer, Stephan Degl. Mr. Degl reports directly to the management and regularly reports on developments related to the LkSG.

Stephan Degl, in his function as LkSG representative of the Ramboll Deutschland Group, signed the report on behalf of the management. The report was prepared on 01.12.2024 and covers the reporting period from January to October 2024.

With the conclusion of the report, Ramboll also refers to the possibility of further information on the values and objectives of the Ramboll Deutschland Group in relation to human rights and environmental protection through the links embedded in this report and through the use of the Ramboll.de and Ramboll.com websites.

Signed by Stephan Degl

For and on behalf of the Ramboll Germany Group



Procurement Manager / LkSG Representative