

Code of Conduct

The way we operate



High Ethical Standards: A Cornerstone of NCC's Success

Every generation has a responsibility to maintain and develop its shared social infrastructure to create opportunities today and in the future. NCC is a knowledge-based company whose core is the ability to manage the complexity of a construction process. We take pride in the end results we deliver to our customers and are truly passionate about the journey that takes us there.

It is crucial that our actions and decisions throughout the construction process are always aligned with our Code of Conduct, which is grounded in NCC's values and Star behaviors. We want all stakeholders, both internal and external, to have confidence that NCC's employees and partners maintain high ethical standards.

Our Code of Conduct serves as a guiding framework that helps us to act in accordance with laws and internationally recognized principles. It also empowers us to address potential issues or challenges and to speak up when we suspect non-compliance.

High performance and commitment to high ethical standards are essential for earning our customers' trust and sustaining long-term competitiveness, which is why adhering to the Code of Conduct is a cornerstone of NCC's long-term success.



"We want all stakeholders, both internal and external, to have confidence that NCC's employees and partners maintain high ethical standards."

Tomas Carlsson, CEO

Our Culture

We believe that all employees make a difference and that we shape the company culture together through our everyday behaviors at work.

Our Star behaviors serve as a guide on how to act and must be followed by all NCC employees. Together with our values, they set the standard for the collaborative, ethically responsible and high-performance culture that we want.



Our values: Honesty, Respect and Trust

Our values are interlinked and express our:

- ◆ Genuine and open attitude toward colleagues, customers, and other stakeholders.
- ◆ Fundamental respect for all people and their unique backgrounds, skills and experiences.
- ◆ Confidence in people's ability to achieve great things and to rely on each other's intentions.

Our Star behaviors:

Act with passion to perform

We challenge ourselves and each other to constantly improve and outperform our targets and results.

Build together

We work actively to ensure effective collaboration internally, in and between units, and with our customers.

Follow through and follow up

We take data-informed decisions, communicate them clearly and always act on what has been decided.

Act with care

We take responsibility for our actions and use of resources. We mitigate risk and act with integrity for safe, high-quality and responsible operations.

Our Code of Conduct

We are committed to acting with care and conducting our business lawfully, with high ethical standards and in a manner that is respectful and builds trust.

Rooted in our values, Star behaviors and internationally recognized principles, the Code of Conduct provides guidance and helps us behave and act in accordance with laws and high ethical standards.

The Code of Conduct applies to all of us and should guide us in our daily work.

If the law is stricter than our Code of Conduct, we follow the law. However, when the Code of Conduct is stricter than the law, we follow our Code of Conduct.

The Code of Conduct:

- ◆ Serves as a set of principles to apply in our daily work.
- ◆ Helps us behave and act in accordance with applicable laws and regulations and to fulfill our obligations as a signatory to the UN Global Compact.
- ◆ Promotes consultation and empowers us to stand up for what we believe is right and to speak up when we suspect something is wrong.
- ◆ Provides clear guidance where possible and the principles of behavior to help guide our decision-making when clear guidance is missing.
- ◆ Is supported by policies, directives, and procedures to further detail our internal rules.
- ◆ Sets expectations on our business partners as we only want to work with those whose actions align with our ethical standards. For our suppliers, we also have a Supplier Code of Conduct.

Your role:

- ◆ **Know it.** Take the necessary time to read and understand the Code and ask questions if something is unclear.
- ◆ **Let the principles guide you.** Use the Code to stimulate and guide discussions about appropriate business conduct.
- ◆ **Speak up.** Remember that there will be no retaliation if you raise a concern or report potential misconduct in good faith.
- ◆ **Understand the consequences.** A breach will be taken seriously and could result in disciplinary actions, ranging up to and including dismissal.

We are a signatory to the UN Global Compact and we adhere to its ten principles covering human rights, labour, the environment and anti-corruption.

Our Responsibility

We are all part of building the continued long-term success of our company irrespective of the position we hold.

Our Code of Conduct is an essential guide to our way of working.

Failure to follow the principles of our Code of Conduct will be taken seriously and could result in corrective or disciplinary actions, including dismissal. Non-compliance may also result in criminal charges.

Responsibility as an employee

We expect our employees to maintain and protect the reputation and integrity of NCC. To do this, it is important that you read, understand and comply with this Code of Conduct. Use your best judgment and always strive to make ethically sound decisions.

The Code of Conduct is designed to safeguard you, your colleagues, our company and our customers.

While it is not always easy to know what the right thing to do is, remember that you have resources and training available to support you. If in doubt, always ask and if you observe or suspect any misconduct, speak up.

Always complete your mandatory training on time.

Responsibility as a manager

We expect our managers to be role models – in their words and actions. Make sure your team is familiar with the Code of Conduct and how to use it. Guide your team in discussions about how to approach a situation and comply with the Code of Conduct.

Create a safe space for everyone to raise questions or concerns without fear of retaliation and act swiftly to address those concerns.

Follow up to ensure your team members complete the mandatory training on time.

Speak Up

Speak Up

We want you to speak up if you suspect or observe a violation of the law or our Code of Conduct. When you speak up, this enables us to improve our work environment, reduce risk and continue acting as a responsible company with high ethical standards.



How do I speak up?

For employees, it is generally best to report a concern directly to the manager (or manager's manager). If you prefer, you can contact your HR or Legal representative.

You can also contact Head of Compliance via email: compliance@ncc.se

For Health & Safety, Security and Data Privacy incidents, please use the relevant reporting channels.

Your report should be raised in good faith i.e. based on facts and observations that you believe to be true. While you should be as concrete and detailed as possible, you do not need to collect evidence or investigate the matter.

When do I use the Speak Up hotline?

If you do not feel comfortable reporting to any of the internal resources, fear retaliation or if you already made a report that was not handled to your satisfaction, you may report your concern to our Speak Up hotline.

Our Speak Up hotline is externally hosted and available 24/7. You can report a concern in English or in any language of the countries where we have operations.

This tool enables anonymous reporting. It can be accessed online through NCC's internal and external websites or by phone via country-specific telephone numbers found on our websites. It is available to our employees and our business partners.

While it is possible to report anonymously, we encourage you to identify yourself to help facilitate a successful investigation.

What happens after I have raised a concern?

Once you make a report, we will follow up on your concern in a professional manner and take appropriate actions. Relevant case details that you (the reporter) provide are recorded in a case management database. We treat all reports as confidential and share information only as necessary to investigate or respond properly.

No retaliation: If you raise a concern in good faith, we will not tolerate any form of retaliation.

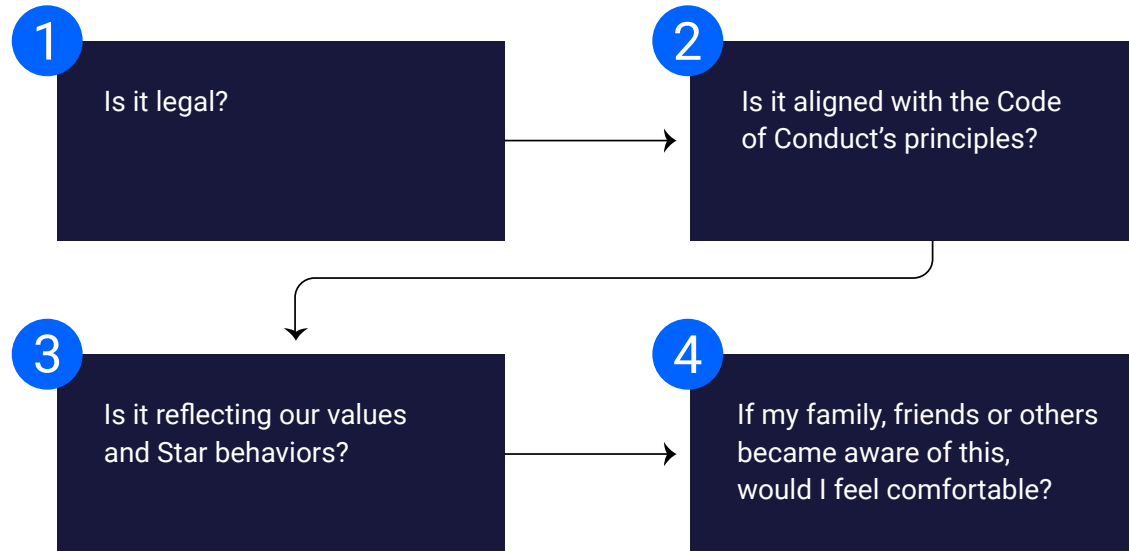
Ethical Decision-Making Guidance

Our Code of Conduct sets out rules for how we do business and the principles we hold ourselves accountable to. However, it is not meant to provide specific guidance on every situation that may arise and sometimes, the right thing to do is not obvious.

If you cannot find the answer in the Code of Conduct or any of the supplementing policies and directives, our ethical decision-making steps may provide guidance and help ensure that you act with integrity.

Always remember to discuss difficult decisions with your colleagues and manager, using the decision guide for support.

Do you need guidance on whether it is the right thing to do?
Don't make tough decisions alone.
Discuss the following with your colleagues and manager:



If the answer to any of the above questions is "No", then simply don't do it.

Health & Safety

Why?

We all have the right to be safe at work and have a healthy work environment. Accidents, injuries, near misses, work-related illnesses and unsafe conditions are often preventable.



Our principles:

- ◆ We act with care and always put safety first at NCC.
- ◆ We are committed to continuously improving our health and safety management systems and practices.
- ◆ We recognize that safety at work includes physical safety as well as work-life balance and psychosocial well-being.
- ◆ We prohibit the use or possession of illegal drugs as well as abuse of prescription drugs when on our sites or conducting our business.
- ◆ We prohibit the consumption of, or being under the influence of, alcohol during all working hours, including meal or break periods.
- ◆ We recognize, promote and share good health and safety practices across our business.

For you this means:

- ◆ Take responsibility for your own safety as well as the safety of others around you.
- ◆ If you are a manager, ensure your team is properly trained and equipped for their work.
- ◆ Participate in all your safety training and speak with your manager if you need additional guidance.
- ◆ Don't work while under the influence of illegal drugs or alcohol.

- ◆ Follow all relevant safety requirements, including the use of personal protective equipment.
- ◆ Immediately stop the work and call for a Time Out if you believe a task or behavior is unsafe.
- ◆ Report all accidents and near misses in Synergi.

What?

For NCC, being committed to health and safety means providing leadership, a workplace environment and work practices that promote a culture in which everyone works to prevent injury and occupational illness and actively supports physical and psychological health and well-being for our people.

Remember:

We work safe or not at all.

Fair Working Conditions

Why?

All employees should be treated fairly and with respect for their human and labour rights.

Our principles:

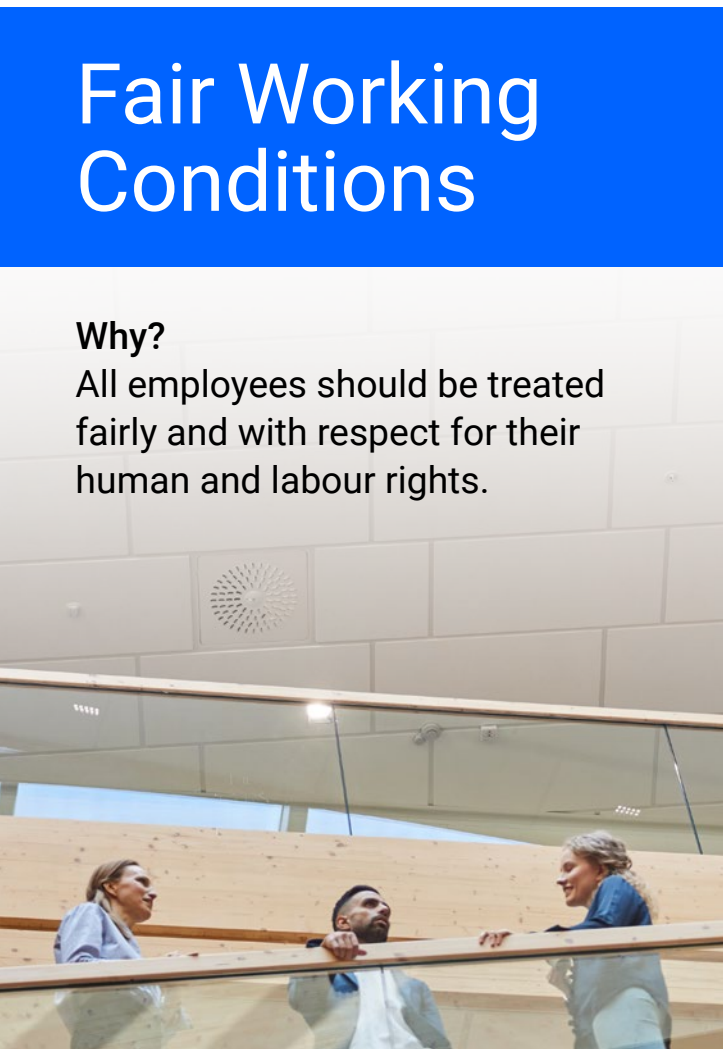
- ◆ We commit to providing fair wages, working hours, secure employment, benefits and other terms of employment, in line with applicable laws, industry standards and relevant labour right principles including ILO conventions.
- ◆ We do not tolerate any form of child labor, forced or compulsory labour or human trafficking, including practices such as inadequate housing or unlawful or illegitimate withholding of wages.
- ◆ We recognize and respect collective bargaining agreements and our employees' right to freedom of association and collective bargaining.
- ◆ We respect the right to all forms of social dialogue and exchange of information between representatives of governments, employers, their organizations, and workers' representatives.
- ◆ We remain rigorous and vigilant that our business dealings, including our supply chain, do not support any form of human rights violation.

For you this means:

- ◆ Ensure that all colleagues and anyone we work with do so freely and are safe from abuse.
- ◆ Stay vigilant and speak up if you suspect anyone's human or labour rights are being violated in connection with our business operations or activities.

What?

A child is anyone under the age of 15 or below any higher minimum age specified by local laws.



Diversity, Equity & Inclusion

Why?

NCC believes that equal treatment and opportunities for all are key to attracting the right competence. A respectful, diverse, and inclusive work environment leads to individual growth and strong, high-performing teams that deliver better solutions for the customer.



Our principles:

- ◆ We support the right to work in a safe and secure environment.
- ◆ We do not accept any disrespectful behavior, bullying, violence, harassment, unwanted sexual advances, or discrimination.
- ◆ We encourage the development of diverse teams at all levels and in all functions.
- ◆ We provide equity in professional development and career advancement as well as equal pay for work of equal value.
- ◆ We make employment-related decisions based on objective criteria and on qualifications such as education, prior experience, skills and merits.
- ◆ We value the unique differences, skills, backgrounds, knowledge, and perspectives of all individuals.
- ◆ We promote a culture of inclusion that embraces everyone's differences and respect all voices.
- ◆ We work actively so that no one is excluded unfairly or due to unconscious biases.

For you this means:

- ◆ Treat everyone fairly and with respect.
- ◆ Avoid behavior that someone else could reasonably find offensive or inappropriate.
- ◆ Listen to your colleagues and business partners and communicate openly.
- ◆ Have an inclusive mindset, encourage new ideas and listen to diverse points of view.
- ◆ Speak up if you observe or suspect bullying, discrimination, harassment or other inappropriate behavior.

Diversity – multiple identities are represented

Diversity in the workplace refers to a workforce that is made up of people from different ages, cultural backgrounds, skills, geographies, physical abilities and disabilities, religions, gender, sexual orientation, and other elements that make individual employees unique from one another.

Equity – ensure equal treatment and opportunities

Equity will eliminate barriers and level the playing field by giving each person equal access to fair and equitable treatment and opportunities, considering their needs.

Inclusion – make room for individual differences and voices

A work environment and culture that enables all employees to participate and thrive and values the unique perspectives and contributions of all employees.

Learning & Development

Why?

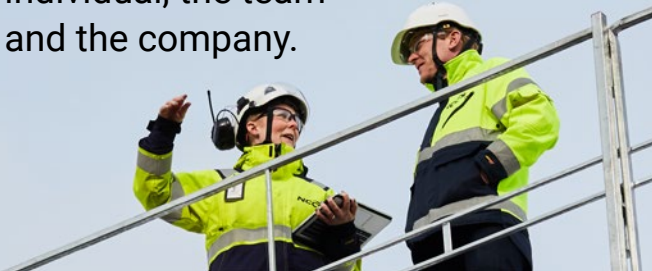
We believe that knowledge builds people and contributes to employee engagement, a learning company culture and better solutions for the customer. By offering continuous learning, we empower individuals to develop their professional competence, benefiting the individual, the team and the company.

Our principles:

- ◆ We provide continuous learning and development opportunities that enable our people to develop, which is beneficial for the business, the individual and the team.
- ◆ We support our employees in growing and developing professionally.
- ◆ We encourage our employees to develop and learn in their day-to-day work, through networking and sharing best practices.
- ◆ We aim to develop the best project management in the construction industry.

For you this means:

- ◆ Take responsibility for your own development and ensure that you learn the skills and competences required to succeed in your role.
- ◆ Engage in your individual goal setting, training activities, and follow-up process.
- ◆ Contribute to a learning culture by sharing and requesting knowledge.
- ◆ Promptly complete all training assigned to you by NCC.



Accurate Records

Accurate Records

Why?

The integrity and accuracy of our business records and documentation are essential for our ability to efficiently run NCC and to maintain external trust in our business.

Our principles:

- ◆ We report in a transparent, fact-based, and timely manner and our financial reporting must give a true, fair and complete presentation of the financial accounts and position.
- ◆ We maintain well-managed, accurate and complete business records consistent with applicable legal requirements and industry standards. This applies across all elements of our business and in relation to both financial and non-financial records and documentation.
- ◆ We maintain the systems and procedures to help gather and store records and documentation in an efficient, accurate and secure manner.
- ◆ We maintain a system of control to ensure the accuracy of the business records.

For you this means:

- ◆ Be honest and accurate when you report or record information about our business.
- ◆ Never record false or misleading information.
- ◆ Ensure that any mistakes or inaccuracies are reported and corrected as quickly as possible.
- ◆ If you submit or approve expenses, ensure they accurately reflect the transaction and comply with internal policies and procedures.



Data Privacy

Why?

In a digital world, personal data is increasingly valuable and vulnerable. Handling personal data with respect and in a secure and lawful manner is part of building and maintaining trust with our stakeholders.

Our principles:

- ◆ We respect everyone's right to privacy and treat personal data with a duty of care.
- ◆ We follow data protection regulations and only collect, use, store and delete personal data in accordance with these obligations.
- ◆ We decide in advance what the personal data will be used for, and we do not use the data for any other purpose.
- ◆ We inform the person whose personal data we are going to process.
- ◆ We keep all personal data safe and secure and will perform appropriate steps as soon as we become aware of any data breach such as unauthorized disclosure or access of personal data, unlawful destruction, or accidental data loss.
- ◆ We provide a workplace with comprehensive technical and organizational measures and internal directives, policies and routines to protect the personal data we process.

For you this means:

- ◆ Know and follow our data privacy, security and confidentiality procedures.
- ◆ Only use personal data for the purpose it was collected for.
- ◆ Handle and store personal data in a secure way.

What?

Personal data includes any information that can help to directly or indirectly identify a living person, for example name, address, date of birth, and personal and business email address.

Some categories of personal data are classified as sensitive personal data, for example political values, medical details, union membership, etc. These categories require extra protection.

Protect our Company Assets

Why?

Our company assets, including verbal and written information, are essential to our work and our business. By protecting and managing them appropriately, we strengthen our foundation for long-term success.



Protect our Company Assets

Our principles:

- ◆ We are committed to preventing fraud and protecting our company assets from damage, theft, loss, manipulation and misuse.
- ◆ We use appropriate means to protect our sites from unauthorized access.
- ◆ We are committed to ensuring high security awareness and competence.
- ◆ We only use NCC assets for business purposes. NCC's digital devices may occasionally be used for personal matters but never in a way that can harm our brand, customers, business partners, personnel or IT infrastructure.
- ◆ We always handle information according to NCC's information classification standards to ensure confidentiality, integrity and availability of company assets.

For you this means:

- ◆ Handle and store all information in accordance with NCC's information security classification standards.
- ◆ Never use NCC's digital devices or IT infrastructure for any side business activity, illegal activity, or for viewing, downloading or sending material that is offensive, illegal, sexually explicit or otherwise inappropriate.
- ◆ Return company assets that are to be replaced or are unused, damaged or outdated.
- ◆ Report all incidents and suspicious activities.

What?

Fraud includes any intentional or deliberate act to deprive the company of property or money by deception or other unfair means.

Theft occurs when assets belonging to the company are taken without the required approval.

Anti-Bribery & Anti-Corruption

Why?

Corruption has a severe negative impact on economic development, weakens trust, and undermines the moral foundation of society. In addition, corruption may have serious reputational, financial and legal consequences.



Our principles:

- ◆ We take a clear stance against corruption.
- ◆ We prohibit bribery and any form of corruption, whether directly or indirectly through third parties.
- ◆ We do not request, accept, offer, promise or pay bribes, including facilitation payments.
- ◆ We only offer or accept gifts and hospitality in accordance with law and our internal rules.
- ◆ We do not provide anything of value to someone involved in a public procurement or exercising public authority.
- ◆ We do not allow the use of charitable donations or sponsorships as a way of concealing a bribe.
- ◆ We do not work with business partners that offer or pay bribes or engage in corrupt activities and we conduct due diligence on our third-party intermediaries and ensure they are retained only for legitimate business reasons.

For you this means:

- ◆ Do not use business partner relationships for personal gain.
- ◆ In your relationship with business partners, avoid activities that could influence you or your counterparty's judgement such as excessive gifts or entertainment.
- ◆ Exercise extra caution in relation to public officials.

- ◆ Always ensure that a gift or hospitality to and from business partners is legal and aligned with NCC's internal rules, including demonstrating a clear, valid business reason and being modest and appropriate for the nature of the business relationship. Remember to obtain required approvals and act with transparency.

What?

Corruption means abuse of entrusted power or position for private gain. A common form of corruption is bribery.

Bribery is the attempt to influence someone in the conduct of his or her duties to obtain or retain business or to secure an improper advantage by, directly or indirectly, offering, promising, authorizing, giving, requesting or accepting an improper benefit. A bribe does not necessarily involve money but can be anything of value.

Improper benefits may comprise cash, excessive gifts or hospitality, non-monetary gifts, pleasure trips or the right to use a vehicle, holiday home or tool for private use.

Remember:

Even if your action is not intended to be improper, it might be perceived to be so by others. Use good judgement in your decisions and actions.

Fair Competition

Why?

We believe that a fair and competitive market is in the best interests of our company, shareholders, customers and employees as it drives efficiency and innovation, which form the basis of a well-functioning market economy.

Our principles:

- ◆ We compete on the merit of our competence and services and do not take actions that are illegal under applicable competition laws.
- ◆ We do not accept any unlawful anti-competitive practices such as price fixing, illegal information exchange, cartel formation or the abuse of market dominance.
- ◆ We will set our pricing with genuine independence based on market conditions, competitiveness and our costs.
- ◆ We never seek to coordinate with competitors, customers or suppliers in ways that could unfairly limit competition in the market. This includes illegal information sharing, price arrangements, market or customer allocations or restricting supply.

For you this means:

- ◆ Never discuss or exchange commercially sensitive information with competitors.
- ◆ Do not enter into any agreement or make any arrangements that could restrict competition.
- ◆ Exercise caution when in contact with competitors whether at a business or social event, including trade association meetings, industry standardization activities or in conversations with a friend who works for a competitor.

- ◆ Always seek advice from the Legal team if you have a question or concern regarding competition laws or contact with competitors.
- ◆ Ensure that records are kept of all meetings with competitors.

Joint ventures

Under certain circumstances and with respect to the applicable legislation, NCC may form joint ventures with partners who complement our capabilities and competencies and can provide resources for a project. However, we do not form any joint ventures to reduce or eliminate competition.

If you are considering forming a joint venture always conduct a proper due diligence and consult with Legal before proceeding.

Remember:

Illegal anti-competitive agreements can be formed in writing, verbally or implied by remaining silent when others agree to a course of action. Always exercise caution when in contact with competitors.

Conflicts of Interest

Why?

As employees, we are obliged to be cautious of situations in which our personal interests and relationships may conflict with NCC's interests. Such conflict creates risks for the business as well as our personal reputation.



Our principles:

- ◆ We always make business decisions in NCC's best interests and based on objective criteria unaffected by private interests or divided loyalties.
- ◆ All employees must disclose any possible conflict between their work and private interests.
- ◆ We manage actual or potential conflicts via disclosure and avoidance or remediation of the situation.
- ◆ We do not make purchasing, hiring or other decisions based on personal relationships, friendships, or the opportunity for personal gain.
- ◆ We prohibit employees from having ownership in business partners or competitors. However, nominal share ownership might be permitted under certain circumstances.

For you this means:

- ◆ Avoid any investment, interest or activity that could cause others to doubt your objectivity or loyalty to NCC.
- ◆ Do not engage in activities that may jeopardize or discredit the interests of NCC, interfere with NCC's operations or in any other way lead to a conflict of interest.
- ◆ Do not misuse NCC resources or any relationships with NCC's business partners for personal gain.
- ◆ Strive to avoid any appearance of bias or favoritism.
- ◆ Promptly disclose potential conflicts of interest, in accordance with NCC internal rules and guidelines.

What?

A **conflict of interest** may occur when there is a conflict between our personal interests and our responsibilities as NCC employees. Conflicts of interest can take many forms.

Be alert to and disclose:

- ◆ Side activities.
- ◆ Financial investments or interests in a competitor, customer or supplier.
- ◆ Situations where you may hire or supervise relatives or those you are close to.
- ◆ Romantic relationships between coworkers carry a high risk for conflict of interest, in particular cases involving managers and team members or others with intersecting responsibilities within the company.
- ◆ Personal relationships with someone with direct or indirect decision-making authority at a supplier, customer, competitor or other business partner.
- ◆ Excessive gifts or entertainment from or to business partners.

Anti-Money Laundering

Anti-Money Laundering

Why?

Money laundering allows criminals to disguise or hide the proceeds of illegal activities by moving funds or assets, so they appear legitimate. We do not tolerate money laundering, and we support international efforts to combat money laundering and funding of illegal activities.

Our principles:

- ◆ We are committed to complying with all applicable anti-money laundering regulations and do not tolerate, facilitate or support money laundering.
- ◆ We only conduct business with reputable business partners who are involved in legitimate business activities, with funds derived from legitimate resources.
- ◆ We take appropriate action where suspicious or criminal behavior is observed and report those transactions to the authorities.

For you this means:

- ◆ Know your business partners and ensure they are engaged in legitimate business activities and be alert to signs of money laundering.
- ◆ Be cautious if asked to be involved in a transaction where money is transferred to or from a person or country that is unrelated to the transaction.
- ◆ Report any suspicious transactions including third-party payments, large cash purchases or the use of cash equivalents.



Trade Sanctions & Restrictions

Why?

Customs and export control laws and regulations determine the requirements for importing and exporting physical goods and non-physical goods. We comply with export, import and sanction laws to ensure legal and responsible international trade.

Our principles:

- ◆ We are committed to ensuring compliance with all trade laws and regulations that apply to our business, including sanctions, export and import controls, and customs laws.
- ◆ We recognize that these laws can apply equally to information as well as physical and financial assets and we seek to develop our controls, policy and internal training accordingly.
- ◆ We do not engage, directly or indirectly, with any person or entity included on an applicable sanction list.
- ◆ We do not conduct business, directly or indirectly, with any country or region subject to sanctions or embargoes.
- ◆ We understand that this is a regulatory area that is constantly changing and endeavor to keep our controls and systems up to date.
- ◆ We incorporate trade compliance in our daily operations.

For you this means:

- ◆ Know your business partners and where we are doing business. Ensure in advance that we can legitimately trade with them without breaching any export or sanction obligations.
- ◆ Understand the trade compliance requirements and regulations related to your daily work.
- ◆ Make use of the instructions and processes that describe requirements and actions to ensure compliance.

What?

Trade laws and regulations cover areas such as rules of origin, customs classification of goods, customs valuation, export control classification, export license management, restricted party screening, embargoes, and sanctions.

Sanctions are legal regulations used by governments to influence foreign policy by prohibiting business dealings with certain countries, individuals, entities or sectors. Sanction lists are maintained by the United Nations, the EU and countries.

Responsible Purchasing

Why?

NCC's reputation and performance are closely tied to the behaviors of our suppliers throughout our supply chain.

Our principles:

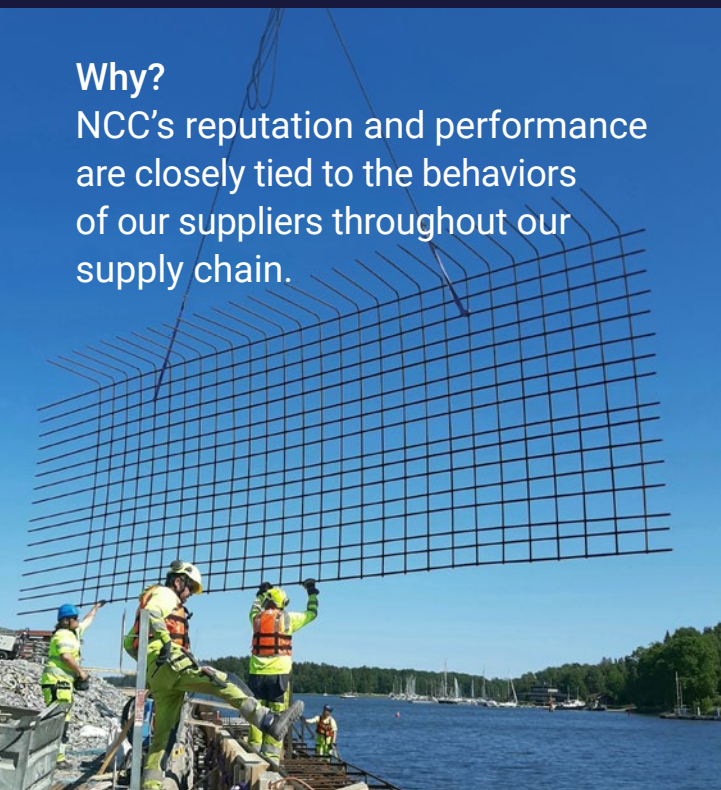
- ◆ We are committed to selecting our suppliers fairly and fostering trustworthy relationships.
- ◆ Our aim is to ensure that NCC's supplier base upholds the same standards of honesty, integrity, and ethical conduct that we hold ourselves to.
- ◆ We communicate our expectations to our suppliers not only at the beginning of our relationship, but throughout its duration.
- ◆ We are committed to the fundamental principles of human and labour rights, as well as the fight against corruption throughout our operations including our supply chain.
- ◆ We work closely with our key suppliers to eliminate greenhouse gas emissions across the value chain, promote circularity and ensure responsible resource use.
- ◆ We carry out appropriate checks on our suppliers to ensure that their background, reputation and capabilities meet our expectations.
- ◆ We review and monitor our suppliers appropriately throughout our relationship.

For you this means:

- ◆ Know and follow NCC's purchasing processes and governing documents, including ensuring that compliance with the Supplier Code of Conduct is always part of the contractual agreement with suppliers.
- ◆ Manage suppliers with honesty, respect and trust.
- ◆ Speak up if you believe a supplier is failing to act with integrity or is not complying with NCC's Supplier Code of Conduct.

What?

In the Code of Conduct, suppliers refers to all companies and entities that deliver goods or services to NCC, directly or indirectly.



Climate & Environment

Why?

We know how materials, methods and processes impact the environment. Through our expertise, data and cooperation we are an enabler for our customers to reach their climate and environment targets.

Our principles:

Climate and energy

- ◆ We are committed to eliminating emissions from our entire value chain, with a focus on purchased goods and services.
- ◆ We work to increase energy efficiency and phase out fossil fuels in our operations.
- ◆ We support society by enabling adaptation to climate change, building energy efficient housing and performing climate-mitigating projects.

Natural resources and biodiversity

- ◆ We are committed to minimizing pollution from production and reducing the negative effects on land, water, and biodiversity.
- ◆ We work actively to enhance biodiversity in operations, and in cooperation with customers for projects.

Materials and circularity

- ◆ We aim to increase the use of circular and recycled materials.
- ◆ We work to minimize and responsibly manage the waste that is created in the construction process.
- ◆ We build to enable recycling and reuse and are committed to phasing out hazardous substances.

For you this means:

- ◆ Always use data to drive improvements.
- ◆ Be active and contribute with your knowledge and expertise in the environmental sustainability transition for NCC.
- ◆ Cooperate and share learnings, in and between units, to fully embrace opportunities for sustainability in projects.



Community Involvement

Why?

We function as an expert, in close cooperation with customers, to ensure that the physical environment is developed with the greatest possible positive effect on society – for current and future generations.

Our principles:

- ◆ We are committed to engaging in dialogues with stakeholders prior to, during and after the construction and work process.
- ◆ We work proactively with customers and use our data and knowledge to secure a positive end result for all stakeholders.
- ◆ Sponsorships, charitable contributions, or scholarships must never be made to procure, or be perceived to procure, an improper advantage for NCC or to support an unethical purpose or activity.
- ◆ We will observe neutrality regarding political parties and do not make any contributions or donations to political associations, parties or candidates.

For you this means:

- ◆ Act with integrity and fairness in all your dealings with our stakeholders, who should always be treated in a professional and respectful manner.
- ◆ Never offer or commit to do something that establishes an undue expectation on the part of either party.
- ◆ You are entitled to participate in politics in your personal capacity but you must not use working time or company resources to promote your personal political interests and you should always be aware of the rules governing conflicts of interests.
- ◆ Ensure adherence to both policy and process when you are considering potential sponsorships.



External Communication

Why?

We communicate with our stakeholders to build knowledge about NCC, increase engagement, position NCC, build a strong brand and manage our reputation to achieve our business objectives.



Our principles:

- ◆ We communicate honestly, transparently, clearly and in a timely manner.
- ◆ We seek to form a constructive and productive dialogue with all our stakeholders.
- ◆ We ensure that information is accurate and not misleading.
- ◆ We have designated spokespersons to communicate publicly on behalf of NCC.
- ◆ When engaging in public policy issues or lobbying, we always follow all applicable laws and act with integrity and honesty.
- ◆ We are politically and religiously neutral.

For you this means:

- ◆ Only speak to media, analysts or investors or engage in social media on behalf of NCC if you are authorized to do so.
- ◆ Don't share non-public information with unauthorized persons.
- ◆ Ensure that you maintain a clear distinction between your personal views and the views of the company whenever you communicate about NCC.
- ◆ Act with care and integrity, use good judgement, and make sure the content is consistent with our core values and Code of Conduct in all your communication.

Requests from media, investors etc.

NCC receives many requests for information from the media, investors, analysts, shareholders and the public.

We must ensure that, as a company, we provide communication that is appropriate, clear, professional and timely. Consequently, we carefully control who can make public announcements on behalf of NCC and ensure professional, consistent, legally compliant and honest responses to requests from the media, analysts and investors.

Questions and information requests typically reach our communication department first. However, sometimes journalists or other individuals may contact other departments or employees directly.

If you receive such a request, please politely refer them to our communication department who can ensure that they are referred to right contact person or seek advice from the communication department before responding.

AI Ethics

Why?

We believe that it is important to ensure a responsible use of artificial intelligence (AI).

Our principles:

- ◆ We acknowledge the importance of ensuring respect for human rights and that health, safety and environmental protection are promoted in connection with the development and use of AI tools and solutions.
- ◆ We are committed to developing and using AI in a responsible, human-centered, secure, accountable, transparent, fair and ethical manner, aligned with the EU Guidelines for Trustworthy AI.
- ◆ Our development or use of AI in the workplace should promote fair working conditions, and extra attention should be given to ensuring balanced input data to avoid bias and discrimination.
- ◆ We ensure there is human accountability and oversight in connection with training, development and use of the AI, particularly where human empathy and judgement may be needed.
- ◆ We take reasonable steps to ensure that AI tools and solutions are robust and resilient against any attack aimed at altering their functioning.
- ◆ We only use AI tools and solutions approved by NCC.

For you this means:

- ◆ Read any available documentation to gain knowledge about any limitations of the system before using AI tools and solutions.
- ◆ Ensure that all AI-generated material is reviewed and take responsibility for the output when using AI tools and solutions for work activities.



