To Whom it may concern

August 2018

Attachment 10 to NIRAS' Integrity Management System - Policy & Procedures, August 2018

STATEMENT ON NIRAS' BUSINESS INTEGRITY AND ETHICS POLICY

On behalf of all companies in The NIRAS Group we hereby declare that NIRAS has a zero-tolerance policy to corruption, tax evasion and fraud as well as to any form of modern slavery, discrimination and harassment.

NIRAS actively contributes to combating corruption and fraud in all of its forms, and strives to ensure that any form of modern slavery and human trafficking as well as discrimination and harassment do not take place within NIRAS' business and supply chains. We are genuinely committed to performing and providing our services accordingly.

NIRAS Business Integrity and Ethics Policy

This policy applies to The NIRAS Group, including all of its subsidiaries, affiliates, sub-consultants, consultants and business units.

- Every partner, organisation, company or individual, with whom NIRAS signs a contract or agreement, shall having read, understood and comply with the parts of NIRAS' Business Integrity and Ethics Policy that concern corruption, tax evasion, fraud, modern slavery and human trafficking, discrimination, harassment, conflicts of interest, and commitment to serve clients and others with respect, excellence and integrity.

- All NIRAS' employees and management are committed to providing quality services to NIRAS' clients, with value added by means of, as minimum, known best practices but striving for new innovative methods and solutions always keeping NIRAS business integrity high.

- NIRAS' objective is to fulfil the clients' expectations and requirements by applying quality management and continuously improvement of technology, performance and delivery through NIRAS' method of work, and with integrity as the overriding principle of behaviour.

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- All NIRAS employees and management play a key role in ensuring NIRAS' integrity. They must perform in accordance with NIRAS' Code of Conduct, and fully understand the ethics of serving clients.

- **NIRAS has a zero-tolerance policy to corruption, fraud and tax evasion**, and will actively contribute to combating any such illegal and unethical behaviour.

  NIRAS distinguishes between 7 types of corruption:
  1. Bribery & Facilitation payment
  2. Fraud & Embezzlement
  3. Extortion & Security payment
  4. Gifts & Entertainment
  5. Conflicts of Interest
  6. Nepotism & Favoritism
  7. Obtaining Undue Advantages

  Type no. 1 and no. 2 are always illegal according to national and international law. No. 3-7 are types that potentially may become corruption, if not managed correctly.

- **NIRAS has a zero-tolerance approach to any form of modern slavery and human trafficking**, and shall ensure that it does not take place within NIRAS' business and supply chains.

- In case of non-compliance with NIRAS' ethical standards, NIRAS will thoroughly investigate the matter and apply the full force of the law, where sufficient evidence is obtained.

- All NIRAS employees and management should avoid situations in which there is, or may seem to be, a conflict of interest both in terms of personal interests and the interests of NIRAS.

- NIRAS acknowledges its corporate social responsibility, and will actively contribute to sustainable solutions and developments that safeguard societies and the environment.

- **NIRAS' internal and external work environment must be free of all sorts of harassment and discrimination**. All employees must treat their colleagues, clients and partners with respect, and observe the highest standards of collegiality.

- **NIRAS subscribes to gender equality and diversity at workplace**, and shall actively, through its employment policy and daily management, contribute to creating a conducive working environment with equal rights and opportunities for all NIRAS' employees.

- Every business unit and member company of The NIRAS Group must stipulate goals and actions for maintaining integrity, and must seek continuous improvement.

On behalf of The NIRAS Group:

Clas Nylandsted Andersen
Chairperson, Board of Directors

Carsten T. Boesen
Chief Executive Officer