

# GROUP POLICY – ANTI-CORRUPTION

The purpose of the Anti-Corruption Policy is to ensure that Ramboll employees worldwide comply with our Global Commitment, high ethical values and applicable anti-corruption laws. Compliance with the Anti-Corruption Policy strengthens Ramboll’s reputational, legal and financial standing, and protects not only Ramboll, but also our employees from potential civil and criminal penalties resulting from prosecution for corruption offences.

Ramboll conducts business with integrity in all business relations and is committed to acting in an honest, responsible and professional way. We uphold high ethical standards and comply with anti-corruption laws, including the UK Bribery Act (UKBA), the US Foreign Corrupt Practices Act (FCPA) and local laws in every country where we operate. In Ramboll we have a zero-tolerance policy towards corruption, which is enforced by:

- Practicing leadership and top level commitment to anti-corruption.
- Implementing this Anti-Corruption Policy and adequate procedures, guidelines and internal controls.
- Communicating this Anti-Corruption Policy internally and externally.
- Providing anti-corruption training to all employees.
- Selecting business associates carefully by having adequate anti-corruption due diligence processes in place.
- Assessing corruption risks periodically.
- Ensuring accessible information and speak-up mechanisms for employees.
- Monitoring and reviewing the effectiveness of the Anti-Corruption Policy, Procedure, Guideline, and internal controls.

## The way we act

Ramboll does not participate in nor support any form of corruption, such as bribery, facilitation payments, or other forms of improper business practice in any country. The different types of corruption that most often occur in our industry are outlined below, including guidance on what is considered appropriate business behaviour by Ramboll employees:

### Bribery

A bribe is anything of value offered to a person in a position of trust in return for improper performance of his or her official duties. ‘Anything of value’ includes not only cash, but a range of favours and inducements such as gifts, dinners, hospitality, donations, advantages, or privileges. Improper performance could include preferential treatment in the awarding of contracts, overlooking of offences or releasing confidential information in return for a favour.

In Ramboll, we have a zero-tolerance policy towards bribery, meaning that:

- We do not offer bribes or accept them from anyone, whether they are public officials, clients or other private parties.
- We do not offer or accept any bribes either directly or indirectly through any business associates.

### Facilitation payments

Facilitation payments are considered a type of bribery. The term ‘facilitation payments’ refers to small payments or goods given to a public official to speed up or facilitate routine government transactions, which the public official is legally obliged to perform without such payment. It includes processing papers, customs clearances where the correct

## CROSS-REFERENCES TO OTHER GROUP POLICIES AND GUIDELINES:

[Code of Conduct](#)

[Group Policy – Global Compliance](#)

[Group Procedure – Anti-Corruption](#)

[Group Guideline – Anti-Corruption](#)

[Group Guideline – CR Guideline on suppliers, Sub-consultants and Consortium Partners](#)

## MANDATORY FOR

All employees

## OWNED BY

Group Compliance

## APPROVED BY

GEB

## DATE

April 2021

## VERSION

2.0

duty has been paid, and issuing permits even though the company meets official requirements.

In Ramboll, we have a zero-tolerance policy towards facilitation payments, meaning that:

- We do not offer or accept any facilitation payments to speed up routine government transactions even if such payments are considered as standard practice in the country of concern.
- We do not offer or accept any facilitation payments either directly or indirectly through any business associates.

### **Gifts, dinners, entertainment, and hospitality**

We may exchange routine business courtesies, including gifts, occasional invitations for dinners, entertainment or hospitality as part of having a good relationship with our business associates, including our clients. Such exchanges are acceptable within reasonable limits, but we need to be very careful. Ramboll employees may under no circumstances offer or accept gifts, dinners, entertainment or hospitality, which could affect our impartiality or influence a business decision. Ramboll has established some generally accepted value limits for gifts, dinners, entertainment and hospitality that apply in all of the countries in which we operate: maximum **EUR 150** per person in any one situation, and maximum **EUR 450** per person in any one calendar year (country exceptions to the value limits may apply and are described in the Group Guideline on Anti-Corruption). However, as these are maximum value limits, you should still ensure that the value of the gift, dinner, entertainment or hospitality offered or received reflects the level and position of the invitee.

Any exceeding of the established value limits must be approved in writing by your PBU Managing Director, or by the person from the PBU Executive Management who has been appointed by the PBU Managing Director with this authorisation.

### **Gifts**

In Ramboll, our policy is:

- We may offer or accept low-value seasonal gifts or gifts on special occasions within the value limits described above, as long as there are no conditions attached and it takes place with full transparency. We recommend offering seasonal gifts or gifts on special occasions bearing the Ramboll logo.
- We never offer or accept cash, or cash equivalents such as gift cards, in any business context.
- We never offer or accept gifts, favours or any other inducements in return for improper performance.

### **Dinners, entertainment, and hospitality**

In Ramboll, our policy is:

- We may offer or accept routine business dinners as long as these are compatible with the recipient's own rules and Ramboll's value limit and provided that there are no conditions attached and it takes place with full transparency.
- We never offer or accept dinners, entertainment or hospitality during the process of competitive bids, tender evaluations or contract negotiations.
- We do not accept payment of our travel and/or hotel costs, or offer to pay for a business associate's travel and/or hotel costs, unless it is transparently included as a part of the costs for the project. We only offer or accept payment of hospitality related to a specific business purpose, e.g. a lunch or a dinner after showcasing existing projects and services, within the established value limits and only with full transparency. Any deviations from this rule must be approved by your PBU Managing Director and your Regional Compliance Manager.
- We never accept or offer to include spouses or partners in invitations.

### Business associates

A business associate is an external party who Ramboll has, or plans to establish, some form of business relationship with. Business associates includes but is not limited to clients, joint venture partners, consortium partners, contractors, sub-consultants, suppliers and agents. Ramboll values its business associates' contribution to the company, and is committed to treating them fairly. In return, we expect our business associates to approach issues of corruption in a manner consistent with the principles of this Anti-Corruption Policy and all other applicable anti-corruption laws and regulations.

In Ramboll, our policy is:

- We expect our business associates to operate according to standards that are compatible with our own, by accepting and signing Ramboll's Code of Conduct for Business Associates and thus adopting a zero-tolerance approach towards corruption.
- The fees that we pay to business associates must be fully transparent, properly documented, recorded and justified by the actual services and deliverables provided.
- Our business associates must not pay bribes, even small facilitation payments, neither on our behalf nor on their own. Under the UKBA, Ramboll can be held criminally responsible for bribes paid on its behalf by any business associate anywhere in the world.

### Charitable contributions and donations

Charitable contributions or donations are monetary or non-monetary gifts to a fund or cause, for charitable reasons.

In Ramboll, our policy is:

- We make charitable donations to worthwhile social causes as part of our commitment to corporate responsibility, e.g. community projects with an educational or scientific purpose.

- We never make a charitable contribution or donation to influence an official ruling or a business decision
- such as the awarding of a contract. That kind of contribution is not a gift: it is a bribe.
- All charitable contributions and donations must be approved by the Managing Director of the PBU that wishes to make the contribution. If it is a Managing Director who wishes to make the charitable contribution or donation, it must be approved by the Group Executive Board (GEB).

### Political contributions and donations

Political donations are monetary or non-monetary gifts to a political fund or cause. We are aware that different countries have different rules on corporate political contributions and donations. Even where such contributions and donations are legal, there is a risk that they may be seen as an attempt to influence political decisions for commercial gain. In Ramboll, we have a zero-tolerance policy towards political donations and contributions, meaning that:

- We are politically neutral and do not contribute to any political parties or campaigns.
- We do not make donations to individuals engaged in politics either locally or nationally.

### What is your responsibility?

It is vital that all Ramboll employees not only understand the importance of the Anti-Corruption Policy, but also comply with it in their daily work. Therefore, all employees of Ramboll have the responsibility to:

- Read and apply this Anti-Corruption Policy in practice.
- Seek guidance in the Anti-Corruption Guideline when in doubt.
- Undertake mandatory anti-corruption training when requested by Ramboll.
- Raise questions and concerns to your manager and/or Regional Compliance Manager, if you feel someone is pressuring or demanding you to pay a bribe or participate in a potential

violation of the Anti-Corruption Policy and/or our Code of Conduct.

- Cooperate fully with the Global Compliance Function when responding to an investigation or audit.

All employees who are not in compliance with the requirements defined in this Anti-Corruption Policy or who fail to report violations of the Anti-Corruption Policy that represent illegal activity, or could cause harm to Ramboll or its employees, can be subjected to disciplinary action (and potentially termination) depending on the nature and severity of the violation. Furthermore, all employees should be aware that a violation of the Anti-Corruption Policy can constitute a violation of the law, and exposes both individuals and Ramboll to civil and criminal penalties

#### **Related Policies**

Roles and responsibilities for the Global Compliance Function, directors and people managers are further outlined in the Anti-Corruption Procedure. Areas of corruption which Ramboll must be particularly aware of are further explained in the Anti-Corruption Guideline, which also provides examples of situations where we may encounter corruption.

If you have any questions about the Anti-Corruption Policy, Procedure or Guideline, please contact either your Regional Compliance Manager or the Global Compliance Function by sending an e-mail to [compliance@ramboll.com](mailto:compliance@ramboll.com).