



## SOTRA LINK AS JV

Code of Ethics



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## A Message From Our Project Director

Our commitment to integrity and ethical business practices underpins everything we do.

We have earned the trust of the client, employees, suppliers, stakeholders and communities in which we work by pursuing our mission: to construct a sustainable future, applying the most innovative solutions to build large infrastructure and by treating people fairly and with dignity and respect. Each one of us holds the hard-earned reputation of the Sotra Link Construction JV in our hands, and I am certain that we shall all continue to make decisions that contribute towards consolidating such reputation on a daily basis.

Rooted in the Sotra Link Construction JV's values and inspired by our vision, our Code of Ethics is a compass to help us understand the ethical principles that guide our business activities. However, our Code does not encompass every situation that we may encounter. Rather, it outlines the general ethical principles that will help each of us to make the right decisions when conducting our business activities.

Personal behaviour, acting as role models and providing contributions are key to making our JV a place in which we are proud to work and a reliable partner for our stakeholders.

If you find yourself in a situation in which you are unsure how to act, believe that a violation of the Code could or has occurred or have a question about a particular issue, do not attempt to resolve the situation on your own. Our Code contains information on resources that you may use to report such questions or concerns without fear of retaliation, including digitally by Link:

Whistle blower hotline: <https://trustcom.pwc.no/sotralink>



I invite each of you to take some time to read and make the Code of Ethics your own, so that all responsibilities are clear to you and you know how to make it part of your daily life and how to report any concerns in good faith.

Everyone's contribution is vital: let's commit to ensuring that the Code of Ethics is known and respected in the Sotra Link Construction JV.

Pedro Manuel Rodríguez Hernández

DocuSigned by:

*Pedro Manuel Rodríguez Hernández*

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## OUR IDENTITY PILLARS

Our identity pillars are composed of:

### OUR PURPOSE

The Sotra Link Construction JV - Partner for a sustainable future

### OUR VISION

We envision, design and build a new world, bringing the present closer to the future, to improve peoples' lives today and tomorrow.

### OUR MISSION

We make sustainable development a reality in the areas in which we operate, applying the most innovative solutions to build major infrastructures.

### OUR VALUES

#### *EXCELLENCE*

- Ability to apply the best skills to meet and exceed client expectations
- Ability to carry out sustainable works while maintaining high levels of quality and performance
- Continuous development of JV know-how by training people and sharing experiences

#### *INTEGRITY*

- Transparency in relations within and outside the Sotra Link Construction JV
- Legality, honesty, fairness, impartiality in behaviour and relationships
- Clear, complete, transparent and timely communication to all stakeholders
- Zero tolerance towards any type of corruption
- Adoption of a governance system in line with best practices to operate according to criteria of maximum efficiency and transparency

#### *RESPECT*

- Respect for human rights, protection of the physical and moral integrity of workers
- Safeguarding the rights and culture of the communities in which we operate
- Inclusion of diversity: gender, age, culture, religion, towards employees
- Enhancement of peoples' skills and constant commitment to their professional development
- Respect for the environment

#### *TRUST*

- Quality and performance in all stages of client relations
- Fairness and transparency in contractual relations
- Impartial evaluation of suppliers based on criteria of quality, professionalism, respect for human rights, health, safety and the environment
- Transparency and timeliness of information to stakeholders
- Constant dialogue with institutions
- Promotion of a culture of listening and teamwork among employees



- Partnerships with suppliers based on fairness and a long-term strategy
- Constant dialogue with the communities in which we operate to contribute to the development of robust societies and economies
- Development of a culture of safety based on collaboration between people and reciprocal care

## *SUSTAINABLE INNOVATION*

- Continuous research, development and adoption of innovative solutions and techniques in building sustainable infrastructure
- Research of new solutions for the efficiency of processes, projects and sustainability of works
- Designing and executing infrastructure with maximum respect for the environment and the principles of sustainability



## Why Is the Code of Ethics Important in Conducting our Business?

The Sotra Link Construction JV's Code of Ethics (our Code) is a guide designed to help all our employees (the "Employees") and the employees of subcontractors, suppliers, consultants acting on behalf of the Sotra Link Construction JV (the "Partners") to connect with our values and provide expectations for our everyday behaviour. The Code is where we find direction on how interact with each other, our client, the communities in which we work and with other stakeholders in our daily work. It is the place to start when we face an ethical dilemma, and it provides information on whom to contact when we have questions or concerns.

As Employees and Partners, we must each read carefully, understand and comply with our Code.

The Code changes along the time and is subject to review by the Sotra Link Construction JV's Steering Committee. Reviews take into account, among other things, the comments and suggestions received from the Employees and the Partners, changes in law or regulations and international best practices, as well as experience accumulated in applying the Code itself.

## Who Is Governed by the Code of Ethics?

All Employees are required to understand and comply with the Code of Ethics, JV policies and laws that govern their business activities. Together with our operative procedures, the Code helps us make the right decisions and take the right actions, regardless of where we work or the type of activity we carry out. We believe that every Employee is a leader, regardless of job responsibilities, title or function therefore she/he shall act as a role model for our peers, the client and others who see us in action every day.

This Code extends beyond the Sotra Link Construction JV as individuals and companies conducting business on our behalf are essential to the work we carry out. Subcontractors, suppliers, consultants acting on behalf of the JV must follow the sections of this Code applicable to them. Applicable provisions of this Code are furthermore included in the contracts with the Partners.

## How Do I Uphold the Standards in the Code of Ethics?

Whenever and wherever you are working on behalf of the Sotra Link Construction JV you must abide by the Code.

All Employees must be aware that they represent the JV with their behaviour, even outside of the workspace if your activity involves representing or appearing to represent the Sotra Link Construction JV. Your conduct affects both the external reputation of the JV and its internal culture.

The Sotra Link Construction JV seeks to create an organisation that adheres to ethical principles and rewards conduct which results in a cooperative working environment in which the dignity of each individual is respected. You are expected to know and follow the Code. Furthermore, you are accordingly required to report violations of law, regulation or JV policy that you become aware of. Your failure to report such violations could place the JV and other Employees at risk. Ask questions and seek guidance from your direct superior or use one of the other channels for reporting a concern.

## How Can I Raise A Concern?

At one time or another we all have concerns about what is happening at work. Usually these are easily resolved by talking with your direct superior or your colleagues. However, when your concern feels serious because it relates to unethical behaviour or violation of the Sotra Link Construction JV policies, you may be worried about raising such an issue and may think it best kept to yourself, perhaps feeling it is none of your



business or only a suspicion. You may feel that reporting the matter would be disloyal to colleagues or the JV. Remember that the Sotra Link Construction JV takes these matters seriously. When you report concerns, you help us handle issues promptly and properly, in some cases address problems before they occur or remedy situations which have already happened. Our procedures enable Employees and Partners to report, in good faith, any concerns they may have without fear of retaliation through digitally by Link:

Whistle blower hotline: <https://trustcom.pwc.no/sotralink>



You can submit an anonymous report through the Whistle blower hotline. Alternatively, you may wish to disclose your name. In all cases, your identity is treated with the utmost confidentiality during the investigations.

## What Happens Once a Concern Is Raised?

We take every report seriously and designated individuals within the Sotra Link Construction JV will investigate it as thoroughly and as confidentially as possible. We expect everyone involved to cooperate fully and honestly.

The Sotra Link Construction JV values your help in avoiding and uncovering possible misconduct. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in an investigation involving a violation of our Code, applicable laws or JV procedures or a situation which is incompatible with ethically correct behaviour. Accordingly, the Sotra Link Construction JV prohibits any action taken against a person who has submitted a report, including demotion, termination, job reassignment, threats and harassment. Persons who raise concerns are also protected by law, with any detrimental measure taken against them subject to sanctions.





## People First

### Health & Safety



*The Sotra Link Construction JV pursues the highest levels of health, safety and hygiene for our workers, and to guarantee the required prevention and protection measures to avoid or reduce professional risks to a minimum. All Employees and Partners are called upon to preventively assess and manage risks, and to intervene in an efficient manner to avoid unsafe situations and behaviours, contributing to keeping their work environment healthy and safe, while guaranteeing the safety of their colleagues and collaborators. The Sotra Link Construction JV undertakes to spread a safety culture within the workplace, involving Employees and Partners in information and training activities. All Employees and Partners, irrespective of their role, are called upon to contribute to occupational health and safety, by actively participating in managing these aspects.*

The emphasis that we put on health and safety in all our operations is indisputable: safety is our core value and “zero accidents” is our target. In order to ensure the protection and wellbeing of each Employee and Partner, we adopt a Health and Safety Management System, in compliance with the standard UNI EN ISO 45001.

We encourage Employees and Partners to become Safety Builders, real builders of safety, and we promote a safe JV culture, by requesting the cessation of activities when it becomes necessary and reporting any unsafe acts or behaviours. We value training and communication as a means of creating a shared culture on Health and Safety, and we require our leaders to shape their management style around safety.

We strive to provide a safe work environment for all Employees and Partners guaranteeing working conditions that respect personal dignity, universally acknowledged human and labour rights, safeguarding workers from acts of physical, psychological violence and prohibiting any behaviour that discriminates or damages a person.

Employees and Partners should never work under the influence of alcohol or drugs (including prescription drugs) that might interfere with your ability to carry out your activities safely. Carrying weapons or fake weapons into the workplace is strictly prohibited.

#### **As an Employee or a Partner, you should:**

- Attend and participate in HSE training sessions;
- Use the personal protective items given for each activity correctly;
- Take note of workplace hazards and ensure to report them to the appropriate person who can correct them;
- Ensure that any work you have been assigned is properly risk assessed;
- Intervene immediately if safety is being compromised in any way;
- Maintain situational awareness by avoiding distractions on the job site or in the workplace;
- Use the equipment assigned responsibly and follow manufacturer recommendations and guidelines given for their products;
- Adhere to all proper protocols to control the spread of infectious diseases;
- Report any and all workplace accidents or near misses to the appropriate HSE personnel.

#### **And you should not...**

- Think safety is someone else’s responsibility;
- Take risk that could endanger your physical integrity or that of others;
- Put other employees in danger by behaving playfully;



- Deviate from established plans without ensuring the new ones are safe;
- Accept compromises with respect to unsafe or unhealthy practices or conditions;
- Conduct operations in a way that is unsafe for the general public.

## Diversity & Inclusion

*The Sotra Link Construction JV strives to be a JV where people, ideas and beliefs from every background are treated, valued, and considered based on their own individual merits and contributions. Furthermore, it acknowledges and promotes the diversity of the Employees as an essential element for JV growth.*

The scope of diversity and inclusion encompasses not only differences in race and gender, but also variety in religious faiths and beliefs, political opinions, abilities, education levels, socioeconomic backgrounds, cultures and much more. As an equal opportunity employer, the Sotra Link Construction JV does not tolerate discrimination based on these grounds or any others protected by applicable law.

Maintaining a diverse and inclusive workplace is critical to ensuring an environment in which professionalism can be pursued to the highest level, giving The Sotra Link Construction JV the strength to lead in our sector.

### **As an Employee or a Partner, you should:**

- Treat everyone you work and interact with respectfully, regardless of title or level;
- Understand and act upon the fact that what may be acceptable to one person may not be to another;
- Consider potential impact of your words and actions and of how they may be interpreted;
- Speak up honestly if you feel the actions of another Employee / Partner are offensive or disrespectful;
- Be generous in both giving and accepting feedback. Feedback is an important part of our culture. Good feedback is kind, respectful, clear and constructive and focused on goals and values rather than personal preferences;
- Be respectful of time zones. Embrace habits that are inclusive, effective and productive for team members wherever they are;
- Keep an open mind about perspectives that differ from your own, attempting to overcome unconscious bias and welcome any form of difference.

### **And you should not:**

- Discriminate against anyone on the basis of ethnic or cultural traits;
- Prejudge people based on stereotypes or other people's opinions or beliefs;
- View or keep suggestive or inappropriate media content at work.

## Discrimination, Harassment, and Bullying

*Recognising fundamental human dignity in the workplace means ensuring that everyone is treated with fairness, respect, and professionalism. The Sotra Link Construction JV prohibits any behaviour that discriminates or damages a person, his/her beliefs and inclinations, particularly in case of any physical or mental impairment, cultural or religious difference or sexual orientation.*

Discrimination, harassment, and bullying are toxic practices that can undermine performance, increase attrition rates and, most importantly, cause lasting psychological harm to victims.

Actions or decisions that treat a person or group less favourably on the basis of an ethnic or cultural trait are discrimination. It is JV policy to ensure that the behaviour of the Employees does not discriminate against any person on the grounds of gender, age, ethnicity, national origin, religion, disability, sexual orientation, genetic information, social and civil status, his/her abilities or any other personal characteristic or on grounds



unconnected with work requirements. In all phases of the employment relationship, decisions regarding Employees must not be based on individual or cultural differences as well as on favours, including sexual ones. Adequate measures to avoid favouritism, nepotism or patronage during the selection phase and hiring and during the actual work contract must be adopted, within the limits of the information available.

Among the most egregious forms of discrimination, harassment is unwelcome conduct and is abusive, intimidating or hostile. Sexual harassment is a specific form of harassment and can include unwanted advances, touching, comments or other behaviour that the recipient finds inappropriate, even if this was not the intention of the person carrying out the action.

Bullying may be described as repeated and unreasonable behaviour directed toward a person, or a group of people, that creates a risk to health, safety and well-being. Bullying hampers productivity by creating dysfunction and damaging morale within working environments. It comprises behaviour that intimidates, offends, degrades or humiliates another person, including by means of email, blogs and social networking sites.

The Sotra Link Construction JV forbids to exploit one's influential position to impose personal favours or any other behaviour that is not expected by the work contract or by JV regulations.

**As an Employee or a Partner, you should:**

- Promote people in their careers based on results and not personal interests;
- Understand the customs of the place in which you work and consequently, adjust your behaviour;
- Do your best to get to know new Employees or Partners to help them adjust and feel welcome;
- Speak up and report any discrimination, bullying or harassment of which you become aware.

**And you should not...**

- Shun, ignore, condescend or insult anyone;
- Threaten, intimidate or assault anyone;
- Stalk, touch anyone inappropriately, catcall, comment on anyone's physical appearance or sexually proposition anyone;
- Use slurs or derogatory epithets of any kind;
- Tell jokes that make fun of or belittle specific people or groups.

**Fair and Favourable Working Conditions**

*Fairness is a foundational principle of all ethical behaviour. The Sotra Link Construction JV ensures all employment relationships are based on mutual benefit by meeting or exceeding the requirements of all laws and agreements that set standards and expectations for the treatment of employees and the conditions of the work environment.*

*In accordance with the International Bill of Human Rights of the United Nations and the Fundamental Conventions of the International Labour Organisation, the Sotra Link Construction JV ensures working conditions respectful of the human rights and fully rejects any form of illegal, child, forced or bonded labour, or practices that constitute modern forms of slavery and human trafficking.*

We strive to maintain a positive working environment where people's dignity and integrity are protected. As part of this commitment, we conduct our operations in order that safety comes first, provide compensation in accordance with prevailing wage legislation and seek to develop the Employees through training and professional development.



**As an Employee or a Partner, you should:**

- Report any unfair or unsafe working condition to the appropriate HSE personnel or HR, or through the Whistle blower hotline: <https://trustcom.pwc.no/sotralink>;
- Verify the professional requirements and practices adopted by employment/recruitment agencies or labour supply companies;
- Ensure adequate standards of board and lodging, where these are provided by the Sotra Link Construction JV at projects;
- Hold yourself to the same high ethical standards you have for others.

**And you should not...**

- Sacrifice working conditions for production;
- Assume fair working conditions is someone else's responsibility;
- Turn a blind eye to unfair practices or conditions;
- Ignore or disregard complaints and reports from co-workers, subcontractors' workers and other stakeholders;
- Violate provisions with respect to shifts and working times.

**Freedom of Association**

*When people work together, they contribute their unique strengths and perspectives to help meet their common goals. The Sotra Link Construction JV respects employees' right to work with colleagues and others to press for changes to improve their lives. The Sotra Link Construction JV protects freedom of association and the rights of workers to lawfully and peacefully associate, organise and bargain collectively.*

As it relates to your employment at the Sotra Link Construction JV, the freedom of association means that you can work with others to advance causes you support. Whether such causes are work-related, political, cultural or religious, we respect the freedom of Employees to participate as fully in civic life as they see fit. Where freedom of association is restricted or prohibited by local laws, we also encourage the Employees to facilitate the adoption of an alternative lawful method of workers' dialogue. We do not tolerate discrimination against persons who join trade unions or workers' representatives, so any groups you join, events or associations in which you participate will not impact your career, so long as they do not adversely impact your job performance or run contrary to the Sotra Link Construction JV's values.

We encourage the Employees to participate in professional organisations and associations that are relevant to their work. These organisations can provide opportunities for Employees to network with other professionals, exchange the latest ideas and develop new skills that they can use every day.

It is important to note that, in order maintain the highest level of neutrality, the Sotra Link Construction JV does not pay any sums or give any gifts to any political and trade union organizations (political parties, political movements, committees, etc.) or to any of their representatives.

**As an Employee, you should:**

- Promote professional growth through exchange of information and dialogue;
- Be civil if politics, religion or other potentially sensitive topics come up at work;
- Note that any statements you make are your own opinions, not necessarily the Sotra Link Construction JV's.

**And you should not:**

- Be judgmental of co-workers' wish to support or participate in associations, organisations and to collectively bargain;
- Press co-workers for details about their political, religious or other affiliations;
- Provide contributions on behalf of the JV to political parties, trade unions or any of their representatives.

**Privacy**

*To uphold the rights of individuals to determine how their own personal information is used, the Sotra Link Construction JV maintains high data protection standards. The Sotra Link Construction JV is committed to collecting and using data in a lawful, fair, legitimate and ethical way. The Sotra Link Construction JV assumes accountability for the compliant processing of personal data by itself or by the Partners.*

When it comes to dealing with personal data in day-to-day business, innovative technologies and digitalisation can represent major challenges. The Sotra Link Construction JV makes every effort to ensure that the use of such personal data complies with legislation, that the impact on the rights of the Employees is minimised and that Employees' rights to access and correct information, for example, are guaranteed.

All Employees are entitled to a certain degree of privacy in the workplace regarding their personal lives and identities. Any employee data that we may need to collect during employment will be confidential and accessible or transferred only for legitimate reasons. We may, however, be required to share such information to comply with laws, court orders or similarly binding requests. Similarly, any information uncovered during a pre-employment background check will become part of the Employee's file and treated confidentially and in accordance with data protection laws.

**As an Employee or a Partner, you should...**

- Ensure any personal data to which you have access to is kept safe and secured;
- Report any loss of data or violation of the information for which you are responsible;
- Collect, use, disclose or store the minimum amount of personal data necessary to achieve a legitimate purpose;
- Only retain personal data for as long as is necessary for the purpose for which it is being processed.

**And you should not...**

- Disclose any personal data to persons who are not authorised to have access to such data;
- Take pictures, videos, or audio recordings of other employees without their consent.



## Business Integrity

### Excellence and quality



*The Sotra Link Construction JV seeks to satisfy its client's needs while keeping high quality, performance and reliability levels. Client's needs must be identified and satisfied by best using the JV's resources and synergies through a continuous constructive dialogue.*

The Sotra Link Construction JV's dedication to quality, innovation and excellence runs deep, as we are committed to develop reliable, sustainable, and resilient infrastructure. The Sotra Link Construction JV's policy asks that each Employee and Partner make it a primary objective of his/her job to deliver high-quality work and contribute to achieving the requirements and expectations of our client, by also supporting the development of innovative processes and solutions. Failing to carefully plan and perform our day-to-day tasks to meet requirements can result in having to repeat the task. Beyond not satisfying our client, this can cause schedule delays and impact the Sotra Link Construction JV's profitability.

To prevent quality issues, each Employee and Partner must strive to execute with excellence the first time and to ensure the work they perform meets or exceeds expectations. Similarly, we must continuously seek to improve our processes and procedures, learn from our mistakes, and hold each other accountable for the quality of work completed. Doing so protects the Sotra Link Construction JV's reputation and helps guarantee the JV's success.

#### **As an Employee or a Partner, you should:**

- Carefully plan your work in advance;
- Stop and check periodically that your completed work meets all requirements and expectations;
- Cooperate with quality auditors as an opportunity for improvement;
- Ensure implementation of inspection and test plans;
- Follow the Sotra Link Construction JV's systems, procedures and plans and seek continuous improvement;
- Report all quality issues, deviations, and non-conformance to your supervisor.

#### **And you should not:**

- Falsify, hide, or misrepresent the results of any quality tests;
- Ignore faulty, incomplete, or substandard work;
- Construct work that has not received the appropriate permits, licenses, or approvals.

## Government Contracting & Client Relations

*The Sotra Link Construction JV bases its contractual relations on fairness, transparency and equity, forbidding any exploitation of potential weaker contractual powers or untruthfulness of facts and conditions to improperly influence client during negotiations. The Sotra Link Construction JV forbids actions carried out to obtain confidential information protected by Law. Any action aimed at inducing, even if only potentially, client or its representatives to commit or fail to carry out actions in breach of the current Law of its relevant legal system is forbidden.*

The Sotra Link Construction JV is convinced that a constant, open and transparent dialogue with representatives of the Public Administration and the client is a fundamental aspect of a good result for the



project.

It is critical that we are aware of and adhere to any and all requirements that come from working on infrastructure project and thoroughly understand client's expectations.

The Sotra Link Construction JV discourages work relations with employees of the Public Administration or former employees of the Public Administration or their relatives, who personally and actively participate or participated in business negotiations or requests for authorisations made by the Sotra Link Construction JV to the Public Administration, except in the circumstances provided for by law.

**As an Employee or a Partner, you should:**

- Interact with representatives of the Public Administration or the client with in an honest and transparent manner;
- Be aware and respect Client's policies and procedures as well as requirements;
- Identify yourself openly and correctly as representing the Sotra Link Construction JV and mention your specific function.

**And you should not:**

- Promise or offer to representatives of the Public Administration or the client any benefit aimed at obtaining advantages for the Sotra Link Construction JV;
- Misrepresent your status or the nature of your inquiries to representatives of the Public Administration or the client;
- Provide false or misleading information to representatives of the Public Administration or the client.

**Correct Information: Retention, Access & Accuracy**

*The Sotra Link Construction JV is committed to promptly providing truthful, correct and authentic information to its stakeholders. The Sotra Link Construction JV forbids any behaviour aimed at altering the correctness and truthfulness of the data and information included within financial statements, its reports or other corporate communications.*

Stakeholders are interested in understanding the Sotra Link Construction JV's operations in all their aspects, from financial and business perspectives to environmental, social and governance aspects. The Sotra Link Construction JV adopts collaborative, fair and transparent conduct in relation to any request made by the Steering Committee, Board of Statutory Auditors, by the Independent Auditors and by the Supervisory Authority, when carrying out their institutional roles.

Fairness of activities is ensured by a procedural system that defines the methods for assuring that every operation or transaction is legitimate, motivated, authorized, consistent, reasonable, documented, recorded and always verifiable.

Employees involved in creating, transmitting, or entering information into financial and operational records are responsible for doing so fully, correctly, accurately and with appropriate supporting documentation. The Sotra Link Construction JV forbids any behaviour aimed at altering the correctness and truthfulness of the data and information included within financial and non-financial statements or its reports.

**As an Employee, you should:**

- Check information with all relevant departments before making such information official;



- Fully cooperate with all governance bodies in providing correct and timely information; Record all transactions accurately and timely to ensure the accuracy of financial and non-financial reports;
- Seek and obtain the proper approvals for all transactions;
- Save all records in compliance with the relevant record retention guidelines.

**And you should not:**

- Publish on personal social media confidential information about the JV;
- Use opportunities at conferences held by industry meetings to exchange confidential JV information;
- Circumvent proper, established processes for any reason;
- Misstate facts, omit critical information or modify records or reports in any way to mislead others, and never assist others in doing so;
- Falsify receipts, records, or any other documents.

**Fraud, Deception & Dishonesty**

*Any informed decision requires a full understanding of the situation at hand. Misrepresentations of any kind deprive others of such understanding. The Sotra Link Construction JV strives to ensure that business activities are conducted with openness and honesty at all times.*

Stakeholders' trust and confidence that honest behaviour and communication create are more valuable over the long-term than any immediate profits we could gain from a short-sighted dishonest scheme.

The Sotra Link Construction JV undertakes daily to guarantee the observance of competition regulations, in full compliance with fair competition principles and abstaining from carrying out collusive and illegal behaviour. The Sotra Link Construction JV forbids any collection of information on competition (e.g., activities, production methods, technologies) carried out illegally or contrary to ethical principles (e.g., theft, corruption, false declarations, E-espionage).

In the same way that third parties rely on the Sotra Link Construction JV's integrity, the JV relies on your integrity. Management needs good and accurate information in order to make the best decisions for the JV. Providing inaccurate or non-timely information leads to mismanagement that ultimately hurts all of us.

While occasional mistakes are inevitable and acceptable, lying about them or trying to conceal them is unacceptable. If you are ever asked or told to lie or provide false information, do not comply and report the incident.

**As an Employee or Partner, you should:**

- Always communicate honestly, openly, and with appropriate discretion;
- Ensure the accuracy of data in all reports by checking it multiple times;
- Quickly report any problems or errors to the appropriate parties for resolution.

**And you should not:**

- Lie or knowingly submit false information to the client, auditors or the Public Administration;
- Mislead or misdirect auditors or investigators;
- Omit relevant or pertinent information when responding to questions or addressing issues;





- Ignore anything you think might be fraudulent.

### Conflicts of Interest

*Employees and Partners must avoid any situation where a conflict of interest may arise, guaranteeing that any decision connected to business activities is made in the JV's interest. Employees and Partners must likewise avoid any situation that could impair their independent judgement or conflict with the responsibilities and tasks carried out by them within the structure or on behalf of the Sotra Link Construction JV.*

Conflicts of interest arise when our personal ties or economic interests overlap with our work responsibilities. All of the relationships we form with individuals and organisations come with expectations and obligations. A conflict of interest occurs when an Employee or a Partner could be expected to act or make a decision at work based on the influence of an outside relationship. These situations can lead to such individuals using JV resources inefficiently, failing to act in the Sotra Link Construction JV's best interest.

Conflicts of interest can potentially occur when an individual with approval responsibilities with respect to recruiting has a relationship with a candidate in the hiring phase, when an Employee is a shareholder in a business that works for the Sotra Link Construction JV or when a family relationship exists between an Employee requesting consulting services and personnel of the advisory firm and other analogous situations.

One of the responsibilities of Employees and Partners is ensuring that business decisions are made based on the JV's best interests.

Even if a conflict has not affected a Employee's or a Partner's judgement or behaviour, the mere appearance of a conflict is often enough to erode trust.

If we do not carefully manage potential conflicts of interest, they may affect our decision-making ability and/or damage our reputation.

#### **As an Employee or a Partner, you should:**

- Disclose any conflicts and obtain advice or approval in accordance with specific JV procedures;
- Report any situations of conflict of interest of which you become aware, even if such situations do not directly relate to you.

#### **And you should not:**

- Pressure anyone to hire or contract with one of your friends or relatives;
- Give or receive gifts that could create expectations of reciprocity.

### Protecting JV Property

*The Sotra Link Construction JV invests its personnel with the responsibility of working with due diligence, in order to protect, guard and maintain JV resources given to them for work purposes, and to use these only in the JV's interest, and never improperly. The Sotra Link Construction JV undertakes to abide by copyright and intellectual property regulations and forbids the use of unauthorized software and data bases on JV computers.*

*JV assets are the property of the Sotra Link Construction JV and should only be used to further the JV's objectives. As such, the Sotra Link Construction JV prohibits all forms of wasteful, negligent, fraudulent, or otherwise improper use of JV equipment, materials and time.*



An asset is anything of value that the Sotra Link Construction JV owns and uses in the course of its operations. Assets include not only tangible things like equipment, materials, furniture and facilities but also intangible ones like our data, software, reputation. To maintain a profitable business, we as Employees and Partners must make sure we use and manage all JV assets both properly and responsibly.

Using assets responsibly and in a sustainable way means making sure we use equipment and materials both safely and efficiently to prevent injury, damage, and waste. This includes making sure the assets are secure from outside threats such as theft, cybercrimes or natural events.

The Sotra Link Construction JV treats all information related to Partners as confidential. JV data are exclusively treated for the purposes mentioned within the agreements that have been made and, in any case, with the full consent of the interested party. Confidential information is managed and communicated, pursuant to the Law and to JV regulations, by the relevant departments. The Sotra Link Construction JV condemns any abuse of information known to Employees and Partners by reason of their role or position.

**As an Employee or a Partner, you should:**

- Be vigilant in protecting devices from loss or theft;
- Ensure regular maintenance is performed before using any equipment;
- Check measurements and plan work carefully before taking action;
- Efficiently use assets and equipment and responsibly dispose of excess materials;
- Follow the appropriate JV financial procedures for all transactions;
- Keep insider information strictly confidential.

**And you should not:**

- Disclose information which is not already in the public domain to any person within or outside the Sotra Link Construction JV not authorised to have access to such information, including family members.

**IT Management & Cybersecurity**

*Software and IT services play a critical role in supporting the Sotra Link Construction JV's operations. The pace at which cybersecurity threats emerge require prompt and agile responses. The Sotra Link Construction JV adopts appropriate steps to ensure that the use of technology does not subject confidential information and personal data to an undue risk of unauthorised disclosure. Bearing in mind the evolving nature of technology and security features that are available, the Sotra Link Construction JV strives to ensure the measures are adapted to the relevant best practices.*

IT services cover functions that are critical to our operations, such as planning activities, design, document management, accounting, administrative and organisation of employees. It is very important to follow guidance with respect to use of such software and their correct application. Using software without a license or appropriate authorisation is a form of theft. Ensure that you agree with the appropriate persons within the competent Departments to gain access to the necessary resources.

Due to the rise of cybercrime, JV data and assets are at greater risk than ever. As such, it is critical that each and every Employee and Partner practices good cyber security habits and adheres to periodic alerts, staying vigilant for phishing attacks and other scams that seek to gain illicit access to the Sotra Link Construction JV's IT systems or steal personal data.



**As an Employee or a Partner, you should:**

- Follow all guidance from the JV concerning software updates for your the Sotra Link Construction JV devices;
- Use a unique and complex password for each different application or login;
- Protect data and information by classifying and marking it properly, and by implementing protective technology and processes (for example, secure your technology devices through security software and configurations that have been approved by the Sotra Link Construction JV);
- Report suspicious emails and other electronic communications to the JV.

**And you should not:**

- Let co-workers use your logins or passwords in order to access software;
- Install unauthorised software on your the Sotra Link Construction JV devices;
- Open any links or attachments from suspicious emails;
- Leave your devices unattended.

**Governance, Risk management and Audits**

*The Sotra Link Construction JV adopts a Governance System based on the highest standards and best practices and is structured to work according to criteria of maximum efficiency and to continuously guarantee improved levels of transparency, contributing to the growth of the JV's credibility for its stakeholders.*

The Sotra Link Construction JV, by adopting dedicated instruments and processes, promotes a control and risk management culture capable of guaranteeing the safeguarding of JV assets, the efficiency and effectiveness of corporate processes, reliability of financial data, respect of laws and regulations and of procedures.

Whether internal or external, audits and assessments help ensure the Sotra Link Construction JV is following all rules and standard practices. Misrepresenting matters the subject of audits only compounds any problems and can make an honest mistake seem like an intentional violation.

The Sotra Link Construction JV is audited regularly as part of our normal business operations. In addition to the periodic financial and non-financial audits, various external entities, such as the client or government agencies audit the Sotra Link Construction JV's processes. Additionally, the Sotra Link Construction JV conducts internal audits help mitigate risks and solve any issues before they become serious problems.

Audits give us an opportunity to ensure that we are meeting our standards of conduct and to improve in areas where we may have fallen short. If an internal or external party contacts you about an audit, you must work with the relevant corporate department to ensure we can respond accurately, thoroughly, timely and with a single voice.

**As an Employee or a Partner, you should:**

- Contact the relevant corporate department when notified of an external audit;
- Cooperate fully with internal and external auditors by providing only accurate and truthful information to auditors and investigators;
- Answer all questions thoroughly to the satisfaction of the auditor or investigator;
- Implement the recommendations emerging from audits.



**And you should not:**

- Respond to an audit without working with the relevant JV department;
- Volunteer data or information different to what was requested;
- Destroy or conceal records, data or information that are needed for an audit, investigation or legal action or when you know of or anticipate an audit, investigation or legal action;
- Attempt to improperly influence the outcome of an audit or investigation.



## Our Place in the World

### Environmental Protection

*The Sotra Link Construction JV has a responsibility to use the Earth's resources wisely and ensure our actions do not compromise the Earth's ability to support future generations. The Sotra Link Construction JV recognises this responsibility by complying with all environmental laws, rules and regulations and following best practices to mitigate the environmental impacts of the projects and activities of the Sotra Link Construction JV.*

*The Sotra Link Construction JV undertakes to safeguard the environment in all of its activities. It does this through processes, technologies and materials capable of reducing energy and natural resource consumption, therefore avoiding or limiting impacts deriving from JV activities (pollution, greenhouse gases, waste production and inconvenience for local communities). It also undertakes to restore worksite areas to their original state.*

Stewardship of the environment is a core component of the Sotra Link Construction JV's identity and guides the projects we pursue. Our client pursues specific environmental outcomes, such as the efficient use of natural resources or the creation of infrastructure which help a sustainable development. As such, it is vital that we strive to conduct our business in a sustainable and ecologically conscious way to help our client reach its objectives and to prevent, reduce, mitigate and compensate any negative environmental impacts of our work.

With the global threat posed by climate change, working diligently to protect and enhance the environment has never been more important. We are proud to help build a sustainable future for all and to contribute to the fight against climate change.

Employees and Partners must always preventively assess and manage environmental aspects, promoting a green and circular economy and intervening in an effective manner to avoid dangerous situations from an environmental perspective. We undertake to spread a sustainable environmental culture within the workplace, involving all personnel through information and training.

#### **As an Employee or a Partner, you should:**

- Promptly report any environmental risks or incidents of which you become aware and intervene to minimise the impact;
- Follow appropriate protocols for disposing of hazardous and non-hazardous waste;
- Reduce consumption of energy, water and other natural resources, as well as products, especially single-use products, and choose products with a minimum impact on the environment;
- Reuse and recycle supplies, materials and other natural resources where permissible and feasible;
- Create a site restoration plan or checklist;
- Ensure that lessons learned related to environmental incidents are properly disseminated and implemented.

#### **And you should not:**

- Assume environmental care is someone else's responsibility;
- Take risk that could endanger the integrity of soil, water or biodiversity around worksite;
- Deviate from established plans without ensuring environmental risks are analysed;
- Turn a blind eye to practices or conditions that might lead to environmental disruption;
- Conduct operations in a way that is unsafe for the environment;
- Print documents, waste energy or water without a specific need to do so.



## Responsible Sourcing

*Suppliers are selected according to fairness and impartiality principles. Selection is made by verifying the quality, technical-professional eligibility, respect of applicable laws regarding human rights and labour - including equal opportunity - health, safety and environmental and economic criteria.*

Understanding suppliers' operations thoroughly is of paramount importance to ensuring the Sotra Link Construction JV operates efficiently and in line with our values. The Sotra Link Construction JV strives to conduct its business with suppliers in a fair, objective, transparent and professional manner: this includes treating the Sotra Link Construction JV working at our premises in the same manner as Employees. We encourage our suppliers to work with us to identify and develop ongoing performance improvements to our responsible sourcing programme.

The Sotra Link Construction JV acts as an advocate for responsible supply chain practices within its industry and encourages its suppliers to apply the same selection criteria when selecting their sub-contractors, aiming at promoting compliance with the principles set out within this Code in every phase of the supplier process.

One aspect of ensuring responsible sourcing is implementing this Code in all our supplier relations: signatory acceptance of those documents by the supplier is mandatory and is an integral part of the contract.

Before contracting with any company, appropriately trained Employees must carry out due diligence to analyse the technical-professional capacities and the respectability of the counterparty, verifying that such counterparty does not profit from or have involvement with unethical practices such as child labour, forced labour, money laundering and bribery. Appropriate due diligence may also protect The Sotra Link Construction JV; from unintentionally working with companies that are subject to debarment or sanctions.

Compensation paid to suppliers is exclusively for the service stated in the contract. Payments must be made neither to a subject different from the person stated in the contract nor to a country which differs from the one formally agreed in the contract. The Sotra Link Construction JV's contractual relations are characterized by fairness and transparency: it undertakes not to exploit any condition of dependence and weakness pertaining to its suppliers.

### **As an Employee or a Partner, you should:**

- Follow the procedures with respect to registration and the qualification of suppliers;
- Promote fair conditions and quality standard along the entire supply chain;
- Keep track of performance KPI and promote continuous improvement;
- Enter into agreements that are satisfactory to all parties.

### **And you should not...**

- Compromise on quality and performance standards;
- Negotiate an agreement without disclosing all relevant information;
- Ignore signs that a supplier may be engaged in unethical business practices.

## Gifts, Donations and Sponsorships

*Employees and Partners cannot ask, promise, offer or receive, either directly or indirectly, gifts or benefits to/from employees of the client, suppliers, representatives of the Public Administration or other organization, and their relatives or people close to them, aimed at obtaining an improper benefit of any kind, not only as an advantage and/or for personal interest, even if only potential, for the Sotra Link Construction JV, but also to benefit oneself, relatives or acquaintances.*



There are many legitimate reasons that can make a gift, donation or sponsorship appropriate in a given situation. Exchanging gifts of a modest amount around the holidays is a common courtesy that can build goodwill; donating to charitable causes is a way we can give back to communities in which we work; sponsoring an event cultivate a positive reputation for the Sotra Link Construction JV in the community.

Unfortunately, all of these can also be interpreted as events aimed at providing an improper benefit or create implied obligations. Ordinary and reasonable entertainment expenses, gifts of a low value and hospitality within the limits set by normal courtesy and in compliance with the relevant JV procedures are allowed.

The Sotra Link Construction JV adopts procedures aimed at guaranteeing that sponsorships are carried out to promote the image of the JV and its activities, guaranteeing the professional competence and reputation of the recipients of these activities and consistency of the transaction with the principles described in this Code.

**As an Employee, you should:**

- Seek appropriate approval for any gifts, donations, or sponsorships;
- Notify your manager if you receive a gift during the course of your work;
- Report if a Partner or client representative requests a gift, donation, or sponsorship;
- Contact the AFC department with any related concerns.

**And you should not:**

- Conceal inappropriate gifts, donations, or sponsorships;
- Provide a gift, donation or sponsorship in response to a request for one;
- Use gifts, donations, or sponsorships to try to influence a decision maker or create an obligation;
- Give any gift or other benefit to any representative of the Public Administration.

**As a Partner, you should:**

- Report to Whistle blower hotline: <https://trustcom.pwc.no/sotralink> if an Employee requests a gift or a favour.

**And you should not:**

- Provide a gift, donation or other benefit to third parties in the name of or on behalf of the Sotra Link Construction JV.

**Anticorruption**

*The Sotra Link Construction JV adopts a “zero tolerance” policy towards any form of corruption, such as bribery (public, private, active and passive) and the granting of improper advantages. It undertakes to always comply with anticorruption regulations in force. It asks all of its stakeholders to always act with honesty and integrity. Behaviour aimed at improperly influencing decisions of representatives of the Public Administration or private entities are prohibited.*

Employees and Partners have to keep in mind that perception matters; certain behaviour could be interpreted as granting and/or receiving an improper advantage, regardless of the intention.

If you think an individual is offering or requesting a bribe, you should refuse and seek to disengage from the situation. If you are unsure of the other party’s intent, try to be as polite as seems reasonable to avoid making the situation unnecessarily accusatory or confrontational.



Contributions, funding or financings obtained from any public or private body, even if of modest value/sum, must be used in accordance with the reason for which they were granted. The Sotra Link Construction JV abides by every national and international regulation and provision prohibiting money laundering and terrorist funding. It is always forbidden to receive cash payments, to be promised payments or to launder money, goods or any other benefit received from suspected illegal or criminal activities, or carry out actions that can hinder the identification of their origin.

The Sotra Link Construction JV envisages types of retribution that are suitable for the JV's targets and are structured to avoid the creation of incentives that are not in line with the JV's interests. Employees operate according to possible, specific, effective and measurable objectives, which are also evaluated in relation to the time taken to achieve such results.

**As an Employee or a Partner, you should:**

- Avoid even the appearance of misconduct;
- Report in a clear and comprehensive manner all economic or financial transactions;
- Report any dubious situations and/or behaviour which may concern instances of bribery or corruption.

**And you should not:**

- Give, offer, accept or request any form of improper benefit;
- Abuse or misuse your position for personal gain;
- Pressure others to hire or contract with one of your friends or relatives;
- Pay above fair market value for goods or services without a legitimate business reason.

**JV Sanctions & Trade Restrictions**

*The Sotra Link Construction JV is committed to ensuring that it complies with the laws including international sanctions laws and regulations. Specifically, these laws and regulations concern restrictions on engaging in business with countries and/or political subdivisions of countries that are subject to sanctions ("Sanctioned Countries") and persons, companies or entities that are domiciled in Sanctioned Countries or are listed on national or international sanction lists ("Sanctioned Persons"). The Sotra Link Construction JV will not enter into business transactions with Sanctioned Countries or Sanctioned Persons, for the areas applicable to its activity.*

Sanctions are measures implemented by a government or an international organisation such as the United Nations which aim to put pressure on the government of the Sanctioned Country, or the Sanctioned Persons, to change policies or practices alleged to be harmful to international peace and security. Sanction Laws typically place restrictions and controls on the movement of goods, services or financings. Generally, a country, individual or company faces sanctions because it is alleged to have engaged in illegal activities, such as terrorism, human rights violations, unlawful exports, nuclear proliferation or other criminal actions.

Employees need to avoid any possible business transaction involving any Sanctioned Country or Sanctioned Person, and in the event of any doubts, must ask the relevant department for confirmation of the existence of sanctions.





**As an Employee, you should:**

- Before entering into any agreement, check with relevant department if the counterpart is a Sanctioned Person or belongs to a Sanctioned Country;
- Reject and report any request by a supplier to make payments to unknown third parties;
- Question the supplier about invoices that show discrepancies or reference an unknown third party.

**And you should not:**

- Use a supplier that has not been approved or qualified by the relevant department;
- Hire a Sanctioned Person.

**Community Engagement**

*The Sotra Link Construction JV respects the rights and culture of the communities affected by its activities and keeps an open dialogue with them. The Sotra Link Construction JV supports and promotes the use of local workforce and suppliers, as much as possible, therefore contributing to the economic and social development of the countries where it works.*

Investing in local communities impacted by our projects and remaining both sensitive and responsive to their concerns is critical. Even if the Sotra Link Construction JV is willing to listen to affected communities since establishing an open dialogue in the construction phase is essential to create reciprocal trust and support.

The engagement of the local community also helps to ensure that any disruptions and inconveniences caused by construction operations are dealt with promptly and minimised. Making open lines of communication allows us to address residents' complaints, issues and concerns to the best of our capabilities, and ensures that any temporary setbacks will be more than offset by the long-term benefit provided by the project.

We strongly encourage the hiring of local workers, subcontractors and other providers as an effective leverage in contributing to the economy of the area in which we are working and creating support and engagement within the communities.

Relations with the communities that are affected by the Sotra Link Construction JV's activities are also developed through donations aimed at supporting works or events for the growth of the territory, after having ascertained the integrity and respectability of the recipients and that the initiative is consistent with the provisions of this Code.

**As an Employee or a Partner, you should:**

- Be aware of and sensitive to local practices and customs;
- Promote the communication with residents about the impact that they will see when the project is undertaken;
- Take steps to protect the local environment and to minimise nuisance on residents.

**And you should not:**

- Ignore or disregard complaints from local residents and communities;
- Make fun of or belittle local customs or cultural practices.



## Social Media

*As technology continues to create new ways for all of us to interact and communicate, the Sotra Link Construction JV strives to create standards and expectations for responsible use of social networks during work activities or regarding information on the brand.*

It is important to think carefully about what you post and the information you share in order to protect the Sotra Link Construction JV's reputation and proprietary business information. Be cautious when you post and do not rely on privacy settings or the ability to delete later.

With appropriate caution, social media can in fact have certain beneficial professional uses. In particular, professional networking sites are great for building connections within the industry, finding potential candidates to fill open positions and events/training which may be relevant for our sector/roles or enable us to act as "brand ambassadors" for the Sotra Link Construction JV. However, social media use in a work context should be limited to avoid inadvertently revealing confidential information regarding activities or a potential project, for example.

### **As an Employee or a Partner, you should:**

- Consider following any of the Sotra Link Construction JV 's official social channels or sharing the content published on such channels;
- Consider membership in professional groups to develop your knowledge.

### **And you should not:**

- Share non-public information that relates to the Sotra Link Construction JV, its activities, its client or the Partners;
- Publish photos on social media which depict activities on the Sotra Link Construction JV's worksites or activities revealing work methods, information on the Sotra Link Construction JV's client or otherwise capture internal documents;
- Post content that is disrespectful, harassing or discriminatory in any message or post that relates to the Sotra Link Construction JV, our activities, the Partners or the Employees;
- To the extent that you are recognisable as an Employee on social media, post content that is disrespectful, harassing or discriminatory in any message or post.



## Ethical Leadership

Being ethical is about playing fair, thinking about the welfare of others and about consequences of one's actions. Ethical leaders think about long-term consequences, drawbacks and benefits of their decisions. For the sake of being true to the JV's values, Employees must be prepared to make ethical decisions in the workplace, where the imperative is: *Do the right thing.*

Ethical leadership brings favourable consequences for Employees, the JV and its stakeholders. Such consequences are reflected in a positive work environment, greater job satisfaction and dedication of Employees to their roles, as well as increased value to the organisation and its stakeholders. JV

## Integrity

Acting with integrity is the foundation to live all our values. Being an ethical leader means "walking the talk", by translating values into everyday actions. Leaders support the organisation and the Employees in doing business in accordance with the Sotra Link Construction JV Values.

Leaders who act with integrity can create value in the Sotra Link Construction JV by attracting, ethically, responsible new hires and by establishing trust. Stakeholders reap the rewards of a leadership that acts with integrity.

## Leading Change

Ethical leadership and change are intertwined. Caring about the value or harm that people can create, considering the domains in which ethical doubts may reside, can help identify where change might be most useful. Leaders within the organisation enhance the Sotra Link Construction JV's readiness to change by challenging the status quo and communicating messages of change. By ethical leadership, the Sotra Link Construction JV creates the conditions for change and growth and incorporates change in the Sotra Link Construction JV's strategy by facilitating ownership of the change process by the Employees and promoting a culture of collaboration among them.

## Working for Inclusion

Leaders in the Sotra Link Construction JV must involve cultures of all kinds, and enabling the development of partnerships, eliminate cultural barriers with the aim of uniting potential conflicting forces. A diverse employee population is critical today. We strive to support a workplace where our employees reflect the multifaceted community base composition. We believe that fostering inclusion and a workplace environment for different voices, perspectives and backgrounds positively impacts communities and resonates with stakeholders.

## How Can I be an Ethical Leader?

1. Discuss the Code with your team and emphasize the importance of doing business in a way that continues to earn the trust of our stakeholders;
2. Clearly communicate what is acceptable from an ethical perspective and what is not;
3. Create an environment of psychological safety by ensuring team members understand you have an open door policy and by encouraging members of your team to voice concerns;
4. Practice giving and receiving feedback with an open mind;
5. Speak often and consistently with team members about our vision, mission and values;
6. Do not bend the principles set forth in our Code for convenience or expediency;
7. Ensure every member of your team has the opportunity to be listened to;
8. Practise self-awareness by sharing your own lessons learned with your team.



### What Should I Do In Uncertain Circumstances?

The Code of Ethics cannot provide specific recommendations for every possible situation. When we are uncertain or feel particularly pressured to make a decision, we must learn to ask ourselves the right questions.

- Is what I am doing allowed under applicable Law?
- Am I observing the Sotra Link Construction JV 's values?
- Is my behaviour in line with JV procedures?
- Would I feel comfortable if I had to explain my actions to a colleague, to my manager or my family?
- Would I be comfortable if my actions were made public?

If the answer to even one of these questions is “No” or if we have a doubt about the legitimacy of our action, we must stop and ask for advice through the most appropriate channel.

Expressing doubts and asking questions helps manage situations correctly and resolve potential problems. Where more detailed information is needed, you can always have a look at the JV's policies and procedures which further articulate the specific operational approach to achieving compliance.

### What Conduct May Be Subject to Discipline?

As an Employee or a Partner, you agree to respect our commitment to ethical conduct. Persons who violate our Code, our internal rules or policies or applicable laws and regulations could be endangering the JV and may consequently be subject to disciplinary measures or penalties.

Conduct which is subject to discipline may also include:

- Not taking the necessary care to report a violation;
- Failing to cooperate with an investigation or destruction or withholding of relevant evidence or information for an investigation or providing false, incomplete or misleading information;
- Attempting to retaliate against a person who has reported, in good faith, a suspected violation or who is cooperating with an investigation.



## Our Sustainability Manifesto

### **PEOPLE**

*We care for our People*

*At the Sotra Link Construction JV, people are the most important resource. They are the ones who conceive and build infrastructure piece by piece – with their hands.*

*Once completed, these great works improve the quality of life of communities everywhere.*

*Our commitment to health and safety, skill development, labour and human rights, diversity and inclusion is paramount.*

### **PLANET**

*We protect our Planet.*

*Through our works we contribute to a better world.*

*Our activities reflect our commitment to environmental protection by adhering to the principles of a circular and low carbon economy, and by delivering infrastructure that is resilient to climate change and preserves biodiversity.*

### **PROGRESS**

*We inspire Progress*

*We use innovation to face global challenges in a sustainable way.*

*We develop technological and managerial innovation to offer future-proof and high added-value construction services so our client can meet environmental challenges and improve people's life.*

*We create value for suppliers and local communities.*

### **PARTNERSHIP**

*We share Prosperity*

*Our commitment to the territories and their development.*

*Our projects and operations sustain socio-economic growth.*

*Maximising job creation, involvement of local business and training, skills and know-how development is our way to share value with the stakeholders of the territories in which we operate, alongside with developing social initiatives and projects dedicated to local communities.*