

Company guidelines for accountability

FCC CONSTRUCCION SUCURSAL NORUEGA

The ensure compliance with the Transparency Act L18.06.2021 nr. 99, the following company guidelines were adopted by the board of the company on 28.06.23:

1. We will respect and promote human rights and decent working conditions across the business in connection with any production of goods and delivery of services.
2. To ensure that human rights and decent working conditions cf. § 3 letter b are respected and promoted, the company will complete due diligence assessments on a regular basis cf. the Transparency Act § 4. All relevant parties will be involved in a collaboration process throughout the company organization.

The company acknowledges the risk for negative consequences in general and particularly associated with the construction industry, including in connection with HSE in the workplace, working hours, overtime, leisure time, minimum wages, equal treatment, and foreign workers and social dumping.

Emphasis will be made on compliance with the Norwegian Working Environment Act, the regulation on posted employees, other associated laws and regulations, applicable collective agreements at any given time, the FCC Group's Human Rights Policy and Code of Ethics and Conduct.

3. We will have the same expectations concerning human rights and decent working conditions towards company suppliers and business partners as towards our own company.
4. We recognize that these guidelines must become part of our ordinary business operations and will require continuous follow-up as part of regular due diligence assessments.
5. We will initiate and complete regular due diligence assessments in accordance with the OECD guidelines for Multinational Enterprises in accordance with the Transparency Act § 4, including accountability, mapping of negative consequences, implementation of measures, follow-up of measures, communication with affected stakeholders, recovery of damages.
6. The top management and the board of the company will have the overall responsibility for compliance with the Transparency Act and the required due diligence assessments but will in the processes involve leaders and employees from different units of the company and delegate responsibility as deemed necessary.
7. The guidelines will be communicated internally and externally to all employees through the company's intranet, personnel meetings or through training, and to business partners and other relevant parties through information or as part of contract.
8. We will promote transparency towards the public and anyone by ensuring access to information on how the company manages potential or actual negative consequences for the business. A due diligence report will be published annually on the company's webpage cf. the Transparency Act § 5. Written inquiries concerning information will be managed in accordance with the Transparency Act §§ 6, 7.

9. Our expectation to our suppliers and business partners will be communicated and agreed upon through contracts or other written documentation, including ethical guidelines/codes of conduct, notice to investors etc.

Our expectations will include that transparency, follow- up and reporting is to be expected. Furthermore, information on how accountability is conveyed further in the supply chain will be included. We will also include information concerning non-compliance with company guidelines as grounds for termination of contract.

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The board of FCC CONSTRUCCION SUCURSAL NORUEGA
Legal Representative
Pedro Manuel Rodriguez Hernandez
