

Stenger & Ibsen Construction Code of Conduct for Employees

Introduction

The purpose of our code of conduct is to ensure that all SIC operations are carried out responsibly, lawfully, and ethically. This code of conduct is provided to SIC employees and outline our expectations for all employees. Moreover, it guides the day-to-day work behavior. The code of conduct is based on the UN Guiding principles for Business and Human Rights.

General requirements

Employees shall comply with all applicable laws, rules, and regulations in the countries where they operate. In case of contradictions between the SIC Code of Conduct and applicable laws and regulations, the applicable laws should always prevail.

Human rights and labour rights

General

SIC expects all employees to respect internationally proclaimed human rights. The requirements related to personnel in the SIC Code of Conduct shall apply to all of the SICs workers, including temporary, migrant, student, and contract workers, as well as direct employees. All workers shall have the right to enter and terminate their employment freely.

Discrimination

We expect all employees to treat each other without discrimination. All employees must have equal treatment and opportunities in employment.

Community engagement and development

SIC employees shall respect affected communities' rights, interests, and development aspirations during significant changes in our normal operations. Community engagement should be conducted in an inclusive, equitable, culturally appropriate, gender-sensitive, and rights-compatible manner.

Child labour, forced labour and young workers

SIC do not accept child labour, forced labour or any form of human trafficking. All employees should be allowed to move around freely.

We shall not employ children below the minimum age of employment or the age for completing compulsory education in that country, whichever is higher. We shall not employ workers under the age of 18 to perform any work defined in national law as hazardous.

All forms of modern slavery are unacceptable to SIC.

Working conditions

Hours of work

SIC employees should ensure that regular working hours and overtime working hours are within the limits permitted by applicable laws and regulations or agreed to in relevant collective agreements.

Wages, leave and benefits

We shall pay a wage including benefits that meets basic needs and strive for a discretionary income in compliance with applicable laws and/ or relevant collective agreements as applicable. Correspondingly workers shall be compensated for overtime at pay rates greater than regular hourly rates.

Freedom of association and collective bargaining

We shall recognize and respect the rights of employees to freely associate, organize and bargain collectively, if they so wish to.

Grievance channels and remediation mechanisms

We should make appropriate grievance mechanisms available to personnel and interested parties, including affected communities, to produce comments, recommendations, reports, or complaints concerning the workplace, the environment, or the business practices. We shall have routines for dealing with harassment and communicate that any form of harassment is unacceptable and must be reported.

Health and Safety

SIC must provide safe and healthy working conditions for all employees. We expect you to continuously improve your work conditions and reduce work-related risks, hazards, injuries, and accidents.

Environment and Climate

We expect all SIC employees to perform their operations responsibly and with care for the environment, striving to minimize negative impacts. All employees must comply with local environmental laws. We expect our employees to actively minimize their usage of resources, including raw materials, energy, water, waste, etc. We shall handle waste in an environmentally responsible way and aim to recycle materials as much as possible.

Business ethics

Business Integrity

SIC expects all employees to conduct business in compliance with all applicable national and international laws and regulations and adhere to internationally agreed standards of business ethics.

Anti-corruption

Employees shall not engage in or tolerate any form of corruption, bribery, money laundering, extortion, or embezzlement. Employees shall not offer or accept any benefits or other means to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips or services and amenities of any other nature.

Competition Law

Employees shall respect and comply with all applicable competition laws and regulations, including an obligation not to exchange commercially sensitive and strategic information with competitors or to enter into anti-competitive agreements with any business partner.

Information and data

All confidential and proprietary information must be kept strictly confidential, except when authorized to disclose data. Non-public information such as business, financial, personnel, or technological information is not to be disclosed without authorization. All information entrusted to you must be protected if employment has ended. Moreover, you must keep data regarding customers, suppliers, employees, and other confidential information protected in accordance with legislations.

Consequences in case of violations

Employees shall address any violations of the SIC Code of Conduct or equivalent standards that come to their knowledge and take appropriate actions. SIC will seek appropriate measures depending on the severity of the violation.

Persistent failure to comply with the SIC Code of Conduct or repeated and unjustified refusal to provide the required information may also result in suspension or termination.

Changes to the Code of Conduct

We preserve the right to change the Code of Conduct at any time and for any reason.

The 11th of August 2023
Balling, Denmark

Jens Bak Ibsen
Jens Bak Ibsen, CEO
Stenger & Ibsen Construction