

## Slavery, Child Labour, and Human Trafficking Statement

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### 1 Introduction

The UK Modern Slavery Act 2015 (the ‘Act’) requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. We are fully committed to playing our part in eradicating modern slavery and we firmly advocate for transparency and collaboration to eliminate the risks of modern slavery.

Multiconsult has published this statement yearly since 2019. This statement, pursuant to Section 54 of the UK Modern Slavery Act 2015 (the “Act”) refers to the financial year ending 2021. It sets out the steps taken by Multiconsult to prevent modern slavery and human trafficking in our operations and supply chains and reinforces Multiconsult’s already established commitment to human rights.

### 2 About Multiconsult

Multiconsult ASA is a public limited liability company established under the laws of Norway pursuant to the Norwegian Public Limited Companies Act and was listed on the Oslo Stock Exchange on 22 May 2015.

Multiconsult is one of the leading firms of consulting engineers, designers and architects in Norway and Scandinavia, and expertise spanning a wide range of disciplines.

As a result of the growth of our international business, we have in recent years established several overseas offices. Currently we have larger offices in Norway, UK, Denmark, Sweden, and Poland.

### 3 Policies

Modern slavery generally encompasses slavery, servitude, forced and compulsory labor and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment.

As an international company with operating entities around the world, Multiconsult faces a variety of risks and regulatory requirements with respect to human trafficking, forced labor, and other forms of modern slavery and we are committed to doing the right thing in all we do.

At Multiconsult we are committed to promoting world-class standards in health and safety, environmental protection, social issues, and business integrity (including sound corporate governance and transparent accounting). This includes taking all reasonable steps to eliminate the risk of slavery and human trafficking in any part of our business or primary supply chain.

Multiconsult has a zero-tolerance policy to modern slavery. We work to the highest professional standards to ensure that we comply with all laws and regulations applicable to the company. All our employees and suppliers are expected to follow the same high standards.

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We are a signatory to the United Nations Global Compact, and our Code of Conduct ([https://www.multiconsultgroup.com/assets/MC\\_EtiskeRetningslinjer\\_ENG\\_interaktiv\\_NY.pdf](https://www.multiconsultgroup.com/assets/MC_EtiskeRetningslinjer_ENG_interaktiv_NY.pdf)) further reflects our commitment to ethical business practices.

Multiconsult's Code of Conduct provides that we do not condone the use of forced labor or human trafficking and emphasises that we will not knowingly conduct business with subcontractors, business partners, suppliers or third parties who violate these laws. The Code of Conduct applies to all employees, officers, and directors, including those of our subsidiaries and joint ventures where Multiconsult has the majority interest. We expect that our suppliers, agents, business partners, consultants, and licensees to follow similar principles, and we also expect our consultants, subcontractors and other third parties to be aware of and adhere to the ethical standards set out in the Code of Conduct.

In addition to the policies and procedures described in this statement, Multiconsult complies with all applicable laws and regulations regarding human trafficking, forced labor, and other forms of modern slavery.

As part of Multiconsult's supply of services, we recognise that we have a responsibility to take a robust approach to modern slavery.

Our commitment to the highest principles of personal and professional conduct is clear throughout our business, and our governance structure is designed to ensure that these principles are clear to every person in the organisation.

### 4 Training

As a professional services organisation our risks associated with slavery and human trafficking are generally low and our staff are often members of professional organisations.

Multiconsult requires that all employees complete bi-annual online training on the Code of Conduct and acknowledge they have read and understand the Code of Conduct, which prohibits human trafficking and forced labor. In addition, employees are required to complete training on evolving areas of compliance on a regular basis. Short training videos, webinars and in-person training sessions are important means of reaching as many employees as possible. We also provide external training for our suppliers.

### 5 Due diligence processes in our business and supply chain

Our work with CSR and business ethics is not limited to Multiconsult's internal activities, but also includes our supply chain and procurement practices. It is therefore an important principle that Multiconsult knows its partners, i.e., its full and legal name, its ownership structure, board members or management, and can examine the business partners' integrity and reputation.

Many of our suppliers are established organisations who govern the prevention of modern slavery by policies, internal training, and audits, but we recognise that not all our suppliers may be so committed. We believe Multiconsult has a role to play in sharing best-practice approaches on prevention of modern slavery with all suppliers. As part of this approach, we also recognise the importance of engaging with our business partners to encourage them to adopt such standards and we expect them to understand and share our commitment to integrating the management of those standards and practices into their business processes. This includes responsible supply chain management processes.

As part of our ongoing risk assessment, we undertake due diligence of our suppliers. Here we investigate the supplier's policies and practices with respect to combating human trafficking, including whether they conduct training and have controls in place to identify and mitigate any suspected slavery or human trafficking practices in its supply chain to identify competence, compliance with our values and standards. Due diligence on clients and suppliers is undertaken through combining our previous experience of working with the organisation, our local knowledge of them, scope of services and the information revealed

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through the newly established Exiger Insight3PM service. We cross-reference the information from these sources before seeking to contract with a supplier. This assessment is repeated on a bi-annual basis.

### 6 Whistle blower portal

Multiconsult's portal for reporting suspected misconduct or whistleblowing is accessible on Multiconsult's website ([www.multiconsultgroup.com/whistleblowing](http://www.multiconsultgroup.com/whistleblowing)) for both internal and external persons and allows for anonymous whistleblowing. All complaints made through the whistleblower portal or other reporting methods are reviewed and investigated. Multiconsult does not tolerate acts of retaliation against anyone who makes an honest and sincere report of a possible violation, or who participates in an investigation of possible wrongdoing.

### 7 Compliance

The Group Compliance Officer heads the Ethics Committee, which is an advisory board to the management on issues relating to ethics and integrity.

Anyone who has questions on ethics, integrity, independence, and anti-corruption, or has observed possible violations of Multiconsult's Code of Conduct, can consult the Group Compliance Officer.

([compliance@muticonsult.no](mailto:compliance@muticonsult.no)).

This statement will be reviewed and updated annually.

### 8 Change log

Rev. no.	Date	Description of change	Approved/verified by
4	31.05.2023	Contents of previous statement are entered into a new template for group governing documents. Minor parts of the document are amended.	CEO of Multiconsult group
1	24.03.2019	First revision of the document.	Group Compliance Officer