



NIRAS Compliance Unit

NIRAS Compliance Unit (NCU) is a corporate unit established to combat corruption in all of its forms, and servicing the entire NIRAS Group. NCU refers directly to NIRAS' CEO. NCU is responsible for anti-corruption training and for the whistleblower arrangement that concerns corruption.

'Corruption' is a general term, covering various sorts of mishandling.

In NIRAS we distinguish between 7 types of corruption:

NIRAS will always consider the first two types of corruption mentioned below as illegal:

1. Bribery & Facilitation payment
2. Fraud & Embezzlement

The following five types of behaviour represent situations that have a potential for becoming corruption. However, if we tackle each situation properly, it is not corruption but instead an example of a difficult situation handled with the right precautions.

3. Extortion & Security payment
4. Gifts & Entertainment
5. Conflicts of Interest
6. Nepotism & Favouritism
7. Obtaining Undue Advantages

NIRAS has zero-tolerance for corruption.

You can either openly report corruption and suspicion of corruption to your immediate manager or to a trusted NIRAS staff member, or you can use the whistleblower arrangement. In any case, the recipient of your reporting is obliged immediately to report it further on to either the NCU or directly to NIRAS' CEO.

NIRAS relies on all employees and management to play key roles in ensuring NIRAS' integrity, internally in our relations with other NIRAS staffs as well as externally in dealing with clients. We must act in accordance with NIRAS' Code of Conduct, and fully understand the importance of complying with ethical behaviour.

Whistleblowing

In NIRAS we call for transparency and openness, also when it concerns subjects such as corruption and other types of improper behaviour. However, there might be occasions where open case handling is not possible. In order to deal with such cases, NIRAS has established a whistleblower arrangement, managed by NCU as regards corruption cases, and by NIRAS HR Department if it concerns harassment, bullying and discrimination.

Reporting of corruption or suspicion of corruption can be made openly by email, letter, note, telephone call or personal appearance to NCU or one of its three Compliance Officers: Claus Jørgensen (cjg@niras.dk), Rasmus Klitgaard (rki@niras.dk) and Merete Reeves (mree@niras.dk) - or it can be made anonymously, for example by use of an anonymous email address from where the message can be sent to either NCU's joint mailbox compliance@niras.dk, established to secure confidentiality and anonymity, or to the personal inbox of any of the three Compliance Officers.

Reporting on harassment (e.g. sexual), bullying and discrimination, can be made openly by email, letter, note, telephone call or personal appearance to NIRAS' HR Department, or it can be made anonymously, for example by use of an anonymous email address from where the message should be sent to the special HR mailbox harassment@niras.dk, established to secure confidentiality and anonymity. The HR guidelines on managing such cases can be found here <http://inni-ras/Employee/HR-policy?contentlang=en> (internal link).

For an investigation to be successful, it is important for the investigators to have a point of contact, preferably a known email address, in order to ask initial questions and understand the given situation in as many details as possible.

When making the reporting openly you can request your identity to stay confidential, while still keeping a line of communication open. The officer receiving your reporting shall respect your wish for confidentiality. In any case, all representations concerning corruption and harassment etc. will be shared in a strictly confidential manner, initially within either NCU or NIRAS HR Department, and later, depending on the character or outcome of the investigation, with NIRAS' CEO.

NCU or NIRAS HR Department will conduct an in-depth investigation of the reported incident. If the investigation reveals that NIRAS code of ethical behaviour has been violated, or it is beyond reasonable doubt that such violation has occurred, depending on the character and seriousness of the violation, the offender(s) will either be sanctioned by NIRAS or the case will be reported to the police.

If the investigation, on the other hand, leads to the conclusion that it is beyond reasonable doubt that the reported accusation has been purposely and falsely made, such a deceitful act will also be subject to disciplinary action.

Please note that the whistleblower will not necessarily receive updates or reports during the investigation of the reported case. However, within 7 days from the date your reporting has been received by the concerned NIRAS officer, you will receive a response on your reporting, and within three months you will receive feedback on the outcome of the investigation together with an explanation hereof.