

## 1 INTRODUCTION

As a company, Nye Veier:

- executes activities that have a great impact on society;
- works in a market with few large providers;
- initiates large projects that affect political processes, interest organisations and private individuals.

Nye Veier therefore relies on having a good reputation and the trust of the population. The attitudes and behaviour of each person are extremely important to enable the company to realise its goals.

The purpose of the code of ethics is to describe how Nye Veier would like co-workers to meet suppliers, colleagues and the surrounding environment in general. The code of ethics shall help us to make good choices as a company or employee.

The code of ethics applies to all employees of Nye Veier, the Board of Directors, contracted workers, consultants and others who act on behalf of Nye Veier, hereinafter referred to as co-workers.

Suppliers are expected to follow ethical standards equivalent to Nye Veier's ethical requirements.

## 2 RESPONSIBILITY

All co-workers at Nye Veier are independently responsible for reading and familiarising themselves with the company's vision, values, current guidelines and requirements in relevant regulations, and complying with them.

Managers at Nye Veier are also responsible for informing co-workers about the code of ethics and ensuring that work within the applicable area of responsibility is carried out in an ethically sound manner.

The code of ethics does not provide answers for all dilemmas a co-worker may encounter. In case of doubt, it is important to take the initiative to speak to the immediate supervisor.

Breach of the code of ethics may have consequences for employment in the form of a warning, dismissal or termination depending on the severity of the case.

## 3 GENERAL RULES FOR PERSONAL CONDUCT

### *Conduct*

Nye Veier's co-workers contribute to a good working environment where everyone is treated with respect and care, and are allocated responsibility. Nye Veier is a workplace where everyone's opinions are tolerated and there is no harassment, discrimination or other behaviour that may be perceived by colleagues or business partners as threatening or demeaning.

Words and actions shall correlate. Management shall set a precedence as good role models for ethics as well. Correct ethical conduct must always be highly valued.

## *Communication*

Nye Veier wants open communication and respect in discussions concerning Nye Veier's activities and between. Information divulged about the company must be correct and reliable. Detected errors are corrected immediately and parties with interests in the matter are notified. Personal statements made by co-workers in the public sphere, including social media, must be made on the individual's behalf. In such cases, it is not permitted to wear clothes from Nye Veier, its logo, accessories or in any other way give the impression of speaking on behalf of Nye Veier.

## *Duty of confidentiality and right to information*

All co-workers have signed a confidentiality agreement in their employment contract. This aims to prevent unauthorised persons from accessing information that may harm the activities or reputation of Nye Veier if improperly used. The duty of confidentiality also applies after the employment contract has been terminated or the assignment completed. Information, strategies and methods that are valuable to Nye Veier, and/or are subject to the duty of confidentiality due to Nye Veier's business activities, must not be divulged externally without special permission from a senior manager.

## *Loyalty*

Nye Veier expects loyalty towards the company's interests, framework conditions, and realisation of goals and strategies. Co-workers use their competence and position to ensure good processes by, among other things, expressing and listening to differences of opinion prior to making decisions. Once decisions have been made, our co-workers are loyal to them.

Co-workers are expected to become familiar with and be loyal to the matrix organisation of Nye Veier and the consequences such organisation has for the interaction between trades and lines.

## *Partiality*

Nye Veier's co-workers must not attempt to obtain advantages for themselves or closely related parties or other persons that could question our integrity.

Nye Veier's co-workers do not partake in or attempt to influence a procurement process if he/she has a personal interest in the procurement. A personal interest may be a financial interest or other. It could exist as a direct personal interest or within a close relationship.

Co-workers complete a statement of impartiality when carrying out procurement and assigning contracts. In addition, co-workers have an independent duty to raise questions about potential impartiality in other cases based on circumstances known to the person concerned. In cases of doubt, the co-worker must take the initiative to request an impartiality assessment. Reference is otherwise made to {{EQSDocument 1226}}.

## *Conflict of interest*

Co-workers must avoid conflict of interest with Nye Veier. Confidential information must never be used to obtain personal advantages. A bribe has taken place when someone tries to affect the execution of another person's tasks and duties by giving them an unfair advantage. Such advantages can be in the form of cash, gifts, credit, discounts, travel, accommodation or services. Co-workers must not receive such advantages; however if such a situation nevertheless arises, the co-worker's immediate supervisor must be contacted.

Co-workers shall avoid appointments or proprietary interests that could question their loyalty to Nye Veier or question the reputation or creditability of Nye Veier. Co-workers shall notify their immediate supervisor when accepting or changing board appointments or similar.

### *Equipment and assets*

The property and chattels of Nye Veier shall be appropriately managed and looked after. IT equipment, materials and other property shall primarily be used in a manner relevant to the work. The equipment of Nye Veier must not be used for pornography, racism or other purposes that may be perceived as offensive.

### *Drugs and alcohol*

Nye Veier is a drug and alcohol-free workplace. No one must work under the influence of drugs or alcohol at Nye Veier. Nor is it permitted to be absent from work due to consuming drugs or alcohol.

### *Sexual services*

Nye Veier has zero tolerance for purchasing sexual services. This also applies to business travel abroad.

## **4 BUSINESS ETIQUETTE RULES**

### *Representation*

Co-workers can partake in social gatherings of a business nature related to the activities of Nye Veier. Representations must be proportionate to the company's business needs and must always be approved by an immediate supervisor. Business connections competing for Nye Veier's competition tenders are exempted from representations.

Nye Veier always covers its share of representation costs. Additionally, Nye Veier shall pay all travel, and board and lodgings with no exceptions.

When attending open meetings or similar, co-workers can accept lunch if served.

### *Gifts*

Co-workers do not accept gifts, regardless the value. Gifts may include wine, flowers, books, commission, discounts, services or other types of attention or services. Before accepting an invitation to hold a speech and/or lecture, the organiser should be informed about Nye Veier's code of ethics covering this matter.

Should co-workers experience a situation where they receive gifts regardlessly, it must be recorded on Nye Veier's form for `{{EQSSchema 1103 -1}}`.

### *Corruption and money laundering*

Nye Veier rejects all types of corruption and money laundering, and we ensure that financial transactions of which Nye Veier is a party, are not used by others to launder money.

### *Work-related crime and social dumping*

Nye Veier actively works to combat work-related crime and social dumping. We have entered into an agreement with the Norwegian Tax Administration, and set requirements in contracts for suppliers and sub-suppliers to obtain information that will safeguard fulfilment of statutory duties, including the Norwegian Working Environment Act, regulations on pay and working conditions in public contracts, and tax and VAT legislation.

### *Reports*

Nye Veier has an open culture where co-workers can discuss matters with their immediate supervisor. All co-workers are encouraged to report culpable matters within the company, see the Norwegian Working Environment Act (AML), Section 2-4. Culpable matters could be breach of Nye Veier's code of ethics or laws and regulations. An attempt must be made to resolve culpable matters at the lowest possible level. If the nature of the matter indicates that it must be reported to a higher level, the report must be made through the line manager, compliance officer or external [reporting channel](#).

Otherwise, reference is made to the reporting procedure or information about reporting channels on [Nye Veier's web site](#).