JUN Hejlesen & Hansen ApS © 2024

# CODE OF ETHICS & BUSINESS CONDUCT 2024

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# OUR CORE VALUES

Since its founding in February 2021, JUN Hejlesen & Hansen ApS (JUN) have dedicated themselves to provide engineering consulting services, performed in accordance with the highest ethical standards. By consistently delivering sophisticated solutions to the challenging and complex issues, JUN has earned its reputation as a responsible consulting firm.

JUN's institutional reputation relates directly to our commitment to professional responsibility as well as professional excellence.

These bedrocks of our corporate culture are reflected in our Company values.



Annelise Hansen (CFO), Caroline Hejlesen (CMO) & Thue Østergaard (CEO)

Founding Owners (Board of Directors)

JUN Hejlesen & Hansen ApS

# RESPECT

### **DIVERSITY**

For JUN (Company) to succeed as a professional firm, we must strive to reflect the diversity of the communities in which we operate. That means we must maintain a workplace atmosphere that attracts and develops people from various backgrounds.

If we do not treat one another with respect, we will not maintain a comfortable and professional atmosphere. Our professionalism is vital to our Company's reputation and retaining our diverse founding base. Together, we must strive to create a workplace that is free from discrimination and harassment.

# EQUAL OPPORTUNITY AND NONDISCRIMINATION

Discriminating against someone for his or her traits is a violation of our Code, Company policies and, in some cases, the law. Such actions have no place within JUN. JUN does not discriminate against others based on race, color, gender, age, sexual orientation or identity, national origin, ethnicity, religion, marital status, pregnancy, physical or mental disability or veteran status. Our Company makes employment-related decisions based on merit. To be clear, "employment-related decisions" include those involving the hiring, and termination of personnel.



### HARASSMENT

In addition, our Company does not tolerate harassment. Harassment can take many forms, including verbal remarks, physical advances, or visual displays, and may come from colleagues or clients. The legal definition of harassment may vary depending on where we are doing business, but such behavior always has the purpose or effect of creating an intimidating, offensive or demeaning environment for another person. It is a form of discrimination and, as such, has no place at JUN.

It is important to note that harassment can be sexual or nonsexual in nature. Sexual harassment may include:

- Unwanted advances
- · Inappropriate touching
- · Sexually suggestive comments or jokes
- Requests for sexual favors
- Inappropriate comments about another's Appearance

#### Non-sexual harassment may include:

- Offensive comments
- Jokes or pictures related to race, religion, ethnicity, gender or age

In order to keep harassment out of our workplace, we must be sure that our comments and actions are appropriate and respectful. If you feel that you have experienced or observed any discriminatory or harassing behavior, you are encouraged to disclose the situation to the Chief Human Resources Officer, or JUN's Board of Directors, immediately.

## **UPHOLDING HUMAN RIGHTS**

As part of our commitment to our community, we uphold individual human rights in all of our operations, and we oppose the use of modern slavery in all forms. This means, in part, that we provide reasonable working hours and fair wages for those who eventually work on our behalf. JUN has a zero-tolerance policy for the use of child or forced labor, or human trafficking practices. Further, we will not knowingly do business with subcontractors, business partners or vendors who violate these practices. JUN could be held accountable for the conduct of these individuals and entities. Therefore, if you have reason to believe any third party is engaging in any of the above practices, report the misconduct immediately.

For more information, contact JUN's Board of Directors.

With respect to labor and employment matters, we adopt and adhere to the following principles set forth in the UN Global Compact:

#### **HUMAN RIGHTS**

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and Principle 2: make sure that they are not complicit in human rights abuses.

#### **LABOUR**

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: The elimination of all forms of forced and compulsory labor.

Principle 5: The effective abolition of child labor

Principle 6: The elimination of discrimination in respect of employment and occupation.

#### **ENVIRONMENT**

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

#### ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

### SUBSTANCE ABUSE

The work we perform for JUN requires us to have sharp, clear minds. Therefore, we must never report to work under the influence of drugs, alcohol or any other substance that may impair our ability to work safely and productively. Our Company prohibits the possession, use, sale, purchase or distribution of any illegal drugs or controlled substances by any employee, consultant, or contractor on Company premises, during working hours or when conducting Company business. Lawfully prescribed medications can be used while at work, provided that their use does not adversely affect job performance or our safety.

While JUN may permit limited alcohol use at approved Company events, you must always use good judgment and exercise moderation in these situations.

### **VIOLENCE**

Acts of threats or violence interfere with our commitment to health and safety and will never be tolerated.

Any threatening behavior, even if made in a seemingly joking manner, must be reported immediately. Also, weapons are never permitted on any JUN premises. If you or someone you know is in immediate danger, call law enforcement authorities immediately.

Then, report the matter internally through normal channels.

# **PORNOGRAPHY**

It is not permissible to possess, distribute, or view pornographic material on JUN property, or use JUN equipment (including computers) to obtain or view such materials. You are strongly encouraged to report the existence of pornography to Human Resources so that appropriate action may be taken, including notification of the proper authorities.

# COMPLYING WITH DATA PROTECTION LAWS

We are committed to the consistent application of data privacy and data protection laws when processing personal data. We are required to ensure that personal information is processed with due care to prevent any misuse or unauthorized access.

All processing of personal data, such as, data on employees, business partners, clients and suppliers, must be in compliance with applicable data protection laws. In addition, we are obliged to ensure that we:

- Keep confidential information safe from loss, theft, or accidental disclosure.
- Comply with all applicable data protection laws and regulations.
- Collaborate with our business partner's on ensuring data security and in investigating and responding to data protection breaches if they occur.

More specific information about the use of data and information appear in the sections below If you are unsure of local requirements, or have other privacy-related questions, you should contact JUN.

# PROTECTING PERSONAL EMPLOYEE INFORMATION

As JUN personnel, we recognize and protect the confidentiality of personnel information. Personal information must not be shared or discussed inside or outside JUN, except as required by law or appropriate legal process, or in connection with an appropriate, lawful business use, or as authorized by the employee. Disclosure of such information to anyone outside JUN under any other circumstances must be approved by the Board of Directors.

Nothing in this policy is intended to or shall prohibit any non-supervisory employee from discussing the employee's wages or terms and conditions of employment with any other individual, entity, union or governmental agency. Further, nothing in this policy is intended to or shall prohibit any conduct protected by any applicable labor law, and an employee will not be subject to disciplinary action or other adverse employment action for engaging in such protected activity.





Ensure women's full and effective participation and equal opportunities

For leadership at all levels of decision-making in political, economic, and public life.

The board of Directors at JUN consists of 67% WOMEN and JUN is proud to be the leading company and motivator on the road towards global equality



# **ANTI-CORRUPTION LAWS**

We never use, support or promote corrupt practices in the locations where we do business. We abide anti-corruption laws, wherever we work. These include the OECD Convention Against Corruption, the United Nations Convention Against Corruption and local jurisdictional laws and regulations. These laws generally prohibit bribery of "Government Officials," and some also criminalize bribery of private persons.

In general, anti-corruption laws specifically prohibit making, promising, offering or authorizing any bribe or kickback in order to obtain an improper business advantage. Our Company will not tolerate any form of improper payments. Just as we cannot make improper payments on JUN's behalf, we also cannot engage an agent or any type of third party to make an improper payment for us. JUN also prohibits "facilitating payments," which are small payments made to individual officials to expedite routine government actions.

A "bribe" or improper payment can be anything of value, including:

- · Cash payments
- · Charitable donations
- Loans
- Travel expenses
- · Gifts and entertainment
- Other favors

In short, any payment or anything of value given with the intent—or even the apparent intent—to improperly influence decisions, obtain information, obtain, or retain business, secure services or induce others to take actions favorable to JUN, is bribery, and is never allowed. Anti-corruption laws are complex, and the consequences of violating these laws are severe. For this reason, one should avoid any activity that could be construed as corrupt.



# PREVENTING MONEY LAUNDERING AND TERRORIST FINANCING

JUN is dedicated to the fight against money laundering and terrorist financing. These illicit activities have become the focus of considerable attention by governments, international organizations and law enforcement agencies around the world. This is an issue that our Company takes extremely seriously.

"Money laundering" is the process by which criminal funds are moved through the financial system in order to hide all traces of their criminal origin. "Terrorist financing" refers to the use of funds that may come from legitimate or criminal sources but are destined for terrorist organizations.

It is extremely important that we know and comply with all laws and regulations aimed to halt money laundering and terrorist financing. To do this, we must be vigilant and exercise good judgment when dealing with unusual or suspicious client transactions. This, of course, means never alerting an organization or individual with whom you have a relationship of any impending or ongoing investigation against them. You also have a duty to alert JUN's Board of Directors about any situation that seems inappropriate or suspicious. If you have further questions or concerns, contact JUN's Board of Directors.

## SUSTAINABILITY

Our responsibility stretches beyond the limits of JUN; from employees to surrounding locations and the environment. JUN strive to achieve transparent and good communication with all those affected by our activities.

We perceive our sustainability work as a central part of our operations and as important for our long-term value creation.

Responsibility for the environment is reflected in our engineering and design activities at JUN. We place great value on reducing our client's environmental impact and the ambition is to conduct business in a sustainable manner. We help our customers in their sustainability initiatives through our customized engineering solutions. Our ambition is to develop new designs for our clients that contribute to more sustainable development in society.

# WAIVERS AND AMENDMENTS OF OUR CODE

Our Code and other policies apply equally to any employee of JUN. Waivers for officers and directors of JUN, must be approved in advance by the Board of Directors.