

Sustainability policy

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1 Introduction

1.1 Background and purpose

The Group Sustainability Policy, in conjunction with associated Group policies, are to be considered as a minimum requirement, providing guidelines for how all employees and stakeholders within our operations, including value chain, shall act to promote a sustainable development.

1.2 Implementation and monitoring

The CEO of NYAB Group is responsible for ensuring that this Group Policy is implemented and monitored throughout the group.

Every individual associated with NYAB, including employees, consultants, and board members, bears the responsibility of implementing the Group Sustainability Policy into their daily tasks. For suppliers the corresponding requirements are set out in the Supplier Code of Conduct.

The Country manager in each country that the Group operates in is tasked with the duty of informing, implementing, and overseeing adherence to the guidelines outlined in the Group Sustainability Policy as an integral part of the company's operations.

The Group Sustainability Policy undergoes an annual review at the group level, with updates made as necessary to ensure its continued relevance and effectiveness.

1.3 Scope

This policy applies to all companies and employees within NYAB Group. All subsidiary companies are expected to adopt the Group Sustainability Policy in their own operations. We also expect our subsidiaries to adhere to all national legislation in which they have operations. In case of national legislation and Sustainability Policy differ, the stricter option should be considered as the minimum standard. This policy should therefore be read together or in conjunction with the subsidiary's own policies specifically designed for their environmental, social and governance risks, opportunities, and impact.

1.4 Definition

Our definition of sustainability is based on sustainability grouped into three areas:

- Environment and climate
- Social and personnel
- Governance and finance

We have established and will maintain a materiality analysis that prioritizes our significant sustainability issues to the greatest extent possible, based on both the impact we have on the environment, people, and the economy (impact materiality), and the impact sustainability issues have on our current and future financial position (financial materiality).

This Sustainability Policy is based around our material sustainable topics which have been established through our double materiality assessment in accordance with the CSRD



regulation. The policy has been developed to include, but not be limited to, the topics deemed material, which for NYAB are ESRS:

- E1 Climate change
- E5 Circular economy
- S1 Own workforce
- S2 Workers in the value change
- G1 Business conduct

1.5 Roles and responsibilities

The responsibility distribution for sustainability work at the group level and within the subsidiaries is as follows:

Role/Title	Responsibility
Board of Directors	- Approves the Group Sustainability policy annually
CEO	- Sets the operational direction for sustainability work by assigning mandates and resources
VP Corporate Affairs	- Responsible for keeping the Group Sustainability policy updated - Gathers feedback from the board and subsidiaries - Communicates the Group Sustainability policy internally and to the sustainability representatives of subsidiaries - Leads reporting from each subsidiary and from the group
Country managers	- Responsible for ensuring policy compliance and setting the direction for its operationalization
Employees	- All employees are responsible for being aware of and contributing to the compliance with this group Sustainability policy

2 Policy

2.1 Environment and climate

As a civil engineering and consulting company, we have a particular responsibility to contribute to environmentally sustainable development. In NYAB this is done, first and foremost, by reducing our climate impact, conscious choices of material and promoting circular resource flows, through the following commitments:

Climate Impact

NYAB systematically work to reduce greenhouse gas emissions throughout the value chain, including our own emissions (Scope 1), purchased energy (Scope 2), and indirect emissions from suppliers and contractors (Scope 3). We promote energy-efficient and fossil-free solutions in our projects and operations.

NYAB facilitate climate adaptation by offering solutions that increase resilience to climate change for our customers and society.

We measure and monitor our climate impact and strive for continuous improvement.



Circular Economy

NYAB aim to minimize waste and increase recycling, reuse, and the use of sustainable materials at all stages through the application of the waste hierarchy

We prefer materials and products with long lifespans, the possibility for repair and reuse, and design for circular flows.

We plan transportation and machinery use to reduce resource consumption and environmental impact.

2.2 Our People and Culture

Working conditions

One of the most important cornerstones of what we do at NYAB has always been motivated personnel who are committed to their jobs. We aim to create a safe, secure, and inclusive work environment where all employees can work without risk of ill health or accidents, and where respect, equality, and a balance between work and private life are a given.

Discrimination

Within the group of NYAB, everyone is entitled to a secure and safe work environment, emphasizing the right to be treated free from discrimination, harassment, offensive treatment and exclusion. We underscore the importance that employees feel their work surroundings contribute positively to their well-being. All employees must be treated with respect and given equal opportunities regardless of gender, age, ethnicity, religion, disability, or sexual orientation.

We also uphold the right for all our employees to freedom of association and collective bargaining based on internationally recognized labor standards. This entails recognizing employees' rights to initiate, join, or refrain from joining a labor union. Harassment, discrimination, or retaliation against employees exercising these rights is not tolerated in any part of our organization or value chain.

Health & Safety

In our workplace, much due to the nature of our sector, a secure and safe environment for all employees is of paramount importance to us. A secure working environment covers both physical risks and the mental health and well-being of our entire workforce.

We promote a strong safety culture in the workplace, where everyone helps each other to recognize risks and prevent or address them. We apply the so-called safety ladder where we first and foremost prevent/eliminate a risk and lastly use protective equipment. We don't hesitate to stop the operation should it appear unsafe. All employees must participate in safety training and have access to the right equipment at work. We also require that subcontractors have the right knowledge and equipment to perform the work safely.



We do not work under the influence of alcohol, drugs or health conditions or medications that may affect safety.

All employees must receive proper training and introduction to work safely. Risk assessments are carried out before each project starts and updated continuously and we regularly review and develop our safety guidelines. Every employee is obliged to observe the established rules and policies and shall promptly report any potential or actual safety concerns or risk observations linked to the work environment.

Human rights

NYAB respects the right to fair working conditions, including equitable wages, reasonable working hours, secure forms of employment, and freedom of association. We adhere to the ILO Core Conventions and all relevant national labour legislation. NYAB maintains zero tolerance for child labour, forced labour, debt bondage, or human trafficking in any part of our operations or supply chain. All employees and suppliers must work voluntarily and have the right to leave the workplace at the end of their shift. We recognize and respect every employee's right to organize in trade unions and to engage in collective bargaining, without fear of retaliation. NYAB conducts risk assessments and regular reviews to ensure that our suppliers and business partners uphold human rights. If there is any suspicion of violations, we act immediately. Furthermore, all employees and business partners are encouraged to report suspected breaches of human rights, anonymously if desired, and without risk of reprisals.

Under no circumstances should any form of sexual exploitation or the purchase of sexual services be associated with our operations, as such activities constitute clear violations of human rights.

Social impact within the value chain

We actively embrace our impact in the whole value chain. This means that we not only focus on our direct impact from our operations but also consider the consequences and risks that may arise in the various stages from procurement and production to where our products and services are utilized.

We place particular emphasis on health and safety to ensure that neither sub-contractors or end-users of our products or projects nor the residents in nearby areas are affected. By implementing measures to minimize vibrations, noise levels, and other potential disruptions during production, we strive to create a safe and comfortable environment for the people in our surroundings.

Our respect for human rights and anti-discrimination applies to the whole value chain. Our suppliers and sub-contractors shall sign our Code of conduct for suppliers in order to carry out work for NYAB.

2.3 Governance and finance

Corruption, anti-bribery and competition

We adhere to laws and regulations while upholding practices to prevent, detect, and report irregularities. We work professionally, ethically, and responsibly NYAB has a zero-tolerance policy towards corruption, bribery, facilitation payments, and improper advantages., and these shall not - either directly or indirectly - occur within our value chain. This includes offers to, receipt of, giving, or solicitation of any form of inappropriate or undue advantage, incentive, service, or nepotism. The risk of corruption shall be actively mitigated in every potential business relationship through active management.

All gifts received or accepted by NYAB employees are to be documented explicitly. Offering inappropriate financial benefits to promote NYAB's operations or in pursuit of the company's other interests is strictly forbidden.

NYAB is additionally committed to advocating fair and ethical payment terms throughout its supply chain. Upholding sound business practices, we prioritize transparent and equitable payment conditions for our suppliers. This commitment reflects our dedication to fostering positive relationships and contributing to a sustainable and responsible business environment

We support free and fair competition and adhere to competition legislation, the objective of which is to promote effective competition and protect the market from unfair business practices.

Corporate culture

Our employees are required to be familiar with the laws, provisions, good practices, and guidelines that apply to their roles. If they are unsure, NYAB employees can always seek guidance from their managers. Our managers in turn, ensure that our employees are familiar with their roles and the necessary guidelines are always available

We show special consideration for our smaller suppliers through payment terms and other conditions.

Training and awareness

All employees have a responsibility to be aware of the contents of this policy and act in accordance with it at any time. Employees shall receive regular training in the area and be noticed when a new version comes into force.

3 Violations of this policy

NYAB promotes responsible business methods and fosters an ethical way of acting. We take all illegal, unethical or any acts that go against our guidelines seriously. We encourage our employees, associates and other shareholders to bring these to our attention every time there is a suspicion of misconduct. The overall accountability for any violations against the Group Sustainability Policy lies with the Group CEO. We



primarily encourage you to contact your supervisor or contact person in our organization. However, if this is not an option, you can report a concern via the reporting channel on our website. The reporting channel is provided by an external and impartial service provider, Lexia Attorneys, who is also responsible for the processing of reports.

All reports are investigated confidentially and in accordance with specified procedures. Possible resulting steps are taken only after the investigation has been concluded. The information from the report or the investigation can only be accessed by the people who need it to complete the investigation.

4 Policy approval, validation and distribution

4.1 Approval

This Sustainability policy and amendments to the policy are subject to approval by the Board of Directors.

4.2 Periodic review and updates

This Policy shall be reviewed at least annually by the policy owner and approved annually by the Board. Changes to the document are subject to approval by the Board.

Date	Version	Description	Author
2023-12-15	1.0	First version adopted by the Board.	NYAB
2024-12-11	2.0	Version update	NYAB

4.2 Distribution

Country managers are responsible for the implementation of this policy in the organization and its processes. All employees shall be offered training in order to create a collective dedication to responsible business practices.

5 Appendices and related documents

Code of Conduct

Supplier Code of Conduct