COMMUNICATING PROGRESS 2011

CORPORATE RESPONSIBILITY REPORT



CORPORATE RESPONSIBILITY (CR) REPORT 2011

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WORKING TOGETHER RESPONSIBLY

We trust that our customers and business partners share our ambition to act as a responsible company that complies with universally recognised ethical principles for business behaviour. And we believe that our customers and business partners on projects acknowledge that we may inform them if – in connection with our professional activities – we identify matters or come across information that we consider unacceptable.

Based on Ramboll's strong fundamentals instilled by our founders and our commitment to delivering sustainable solutions to people and society, we have acknowledged and accepted corporate responsibility for many years. Our commitment to the UN Global Compact gives us the opportunity to advance our efforts and continuously improve our performance as a responsible community consultant operating on a global scale.

Ramboll wishes to be a trusted and responsible partner to our customers. We want to comply with our customers' standards and help our customers in reaching sustainable goals.

We also want to be an attractive and responsible employer giving our employees equal opportunities and freedom of expression – a prerequisite for generating creative and innovative ideas.

In 2011 we progressed our corporate responsibility efforts in a number of areas, which you can learn about in this report. We conducted a business integrity e-learning training course with





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the participation of 65 % of our employees. We managed for the first year to measure our CO2 emissions caused by work related transport based on a new method made by Ramboll experts. We established policies and procedures in relation to our suppliers, partners and customers - with the aim of ensuring within our sphere of influence a broader acceptance and adherence to internationally recognised ethical principles in the areas of human rights, labour rights, the environment and anti-corruption.

O1 Flemming Bligaard Pedersen, Group CEO, Ramboll. O2 Executive Directors, from left: Michael Rosenvold, Søren Holm Johansen, Jens-Peter Saul, Flemming Bligaard Pedersen and Knut Akselvoll.

PEOPLE

"All employees must work as independently as possible, have the freedom of expression that generates a wealth of ideas, and have all the skills they can reasonably exercise. At the same time they must support one another, professionally and personally. The Ramboll family must be imbued with a spirit of trust and confidence. The firm will always benefit - both internally and externally - if the artistic touch and an awareness of the human dimension are evident in all its activities, its products and its services." - Børge Rambøll 1986.

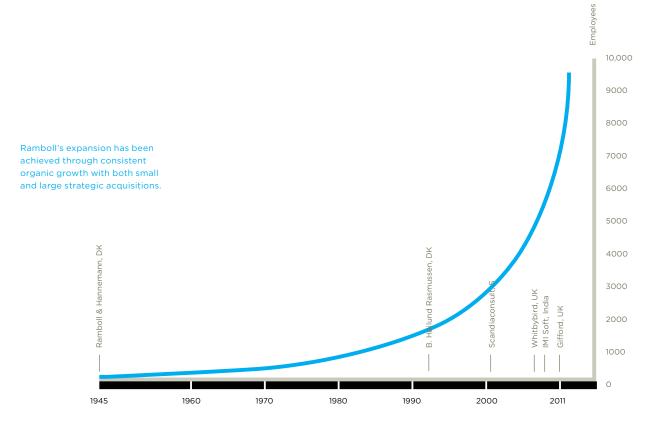
To this day, Ramboll fundamentally believes in people's inherent ability and understands that the inspirational solutions we provide to our customers across the globe are entirely dependent on people's creativity, insight and integrity. At the end of the day, our people – their skills and drive – are the critical factor for success in our business.

In Ramboll, our employees have to strike a balance between being an individual consultant and acting on behalf of Ramboll, and they must therefore act in accordance with Ramboll's values and strategies and they must

understand and act in accordance with our policies, guidelines and governance principles.

Ramboll's human dimension also extends beyond our own employees. We also care and have a responsibility for the community that we are part of.

During the last ten years, Ramboll has grown rapidly and our operations have become increasingly internationalised. We now employ close to 10,000 experts across 21 countries and over 200 offices. As a consequence of our internationalisation, we are everyday faced with people's



COMPANY MILESTONE

challenges around the world, and it has become more evident than ever to stress our opinion on human rights and dissociate ourselves from any abuses that are taking place. We do not participate in projects that are destructive or aggressive towards mankind and we want to ensure that the business partners that we work with also respect human rights.

OBLIGATION TO ACT

As a responsible company, we believe that an integrated part of our business behaviour must be to inform our customers and business partners on projects, if in connection with our professional activities, we identify matters or come across information that we consider unacceptable - also from a business behaviour perspective, and not only from a technical or professional perspective.

In 2011 we launched a new policy - the 'Obligation to act' - with the purpose of adopting a more proactive and systematic approach towards our customers and business partners in relation to specific matters violating our Code of Conduct or internationally recognised ethical principles within:

- HUMAN RIGHTS
- LABOUR RIGHTS
- ENVIRONMENT
- ANTI-CORRUPTION

In essence, the policy is about our own behaviour and what can be expected of us. The policy applies to all employees in Ramboll, independently of position or seniority. Each project manager is responsible for communicating a policy statement to our customers to inform them of our obligations.

We are communicating and training employees on the policy's meaning, importance and impact on our business behaviour. In 2011 all employees have received a leaflet explaining the purpose of the policy and what is expected of them.

ALL MEASUREMENTS HAVE BEEN ESTABLISHED ON THE BASIS OF THE PERFORMANCE OF OUR BUSINESS UNITS

MEASUREMENT WORKS COUNCIL MEETINGS PER YEAR

BUSINESS UNIT	2011	2010	2009
Denmark	4	4	4
Sweden	7	2	1
Norway	2 4	1 2	1 2
Finland	4	4	4
United Kingdom	4	9	6
Middle East	1 2	1 2	5
Russia	•		•
Management Consulting	8	4	4
Oil & Gas	2 1	1 2	4
Telecom	4	4	4
Energy	4	4	n/a*
Ramboll Group	1	1	1

[■] On target ■ Partly implemented ■ Not implemented

MEASUREMENT AGE VERIFICATION

Systematic procedure that ensures age verification prior to employment

BUSINESS UNIT	2011	2010	2009
Denmark	•	•	•
Sweden	•	•	
Norway	•	•	•
Finland	•	•	•
United Kingdom	•	•	•
Middle East	•	•	•
Russia	•	•	•
Management Consulting	•	•	•
Oil & Gas	•	•	•
Telecom	•	•	
Energy	•	•	n/a*

lacksquare On target \lacksquare Partly implemented \lacksquare Not implemented

^{*}The business unit, Energy, was established 1 January 2010.

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MEASUREMENT

OBJECTIVE RECRUITMENT PROCESS

Systematic procedure objectively ensuring that ability, competences, skills, experience and performance are always the basis for recruitment and promotion.

BUSINESS UNIT	2011	2010	2009
Denmark	•	•	•
Sweden	•	•	•
Norway	•	•	
Finland	•	•	
United Kingdom	•	•	
Middle East	•	•	
Russia	•	•	
Management Consulting	•	•	
Oil & Gas	•	•	
Telecom	•	•	
Energy	•	•	n/a*

[■] On target ■ Partly implemented ■ Not implemented

MEASUREMENT

DISABILITY

Systematic procedure objectively ensuring that the HR function is facilitating awareness-raising of disability issues.

BUSINESS UNIT	2011	2010	2009
Denmark	•	•	•
Sweden	•	•	
Norway	•	•	
Finland	•	•	
United Kingdom	•	•	
Middle East	•	•	
Russia	•	•	
Management Consulting	•	•	
Oil & Gas	•	•	
Telecom	•	•	
Energy	•	•	n/a*

[■] On target ■ Partly implemented ■ Not implemented

EMPLOYEE SATISFACTION

7,345 employees, a record number equal to 84% of Ramboll's employees, participated in the Employee Satisfaction and Engagement Survey (ESES) in 2011. The overall result showed a high satisfaction and engagement score of 3.9 on a 5-point scale which is unchanged from 2010.

ESES is carried out each year and all employees are invited to participate. It is important for Ramboll's development in becoming an even better workplace to identify the reasons that indicate why employees are motivated, enthusiastic and satisfied.

ESES is the employees' opportunity to reflect on what matters in their daily work life and by completing the ESES questionnaire they are contributing to improving work satisfaction and engagement – not only for themselves, but also for their colleagues.

From department level to Group level, ESES reveals how satisfied or dissatisfied the employees are with issues relating to their work environment, immediate manager, personal development, engagement, knowledgesharing and innovation.

ESES shows where managers should make an extra effort to improve the conditions that engage the employees in their daily work. As such, it provides important input on how we can strengthen the business through continuous improvement of employee engagement, working processes and management practices.

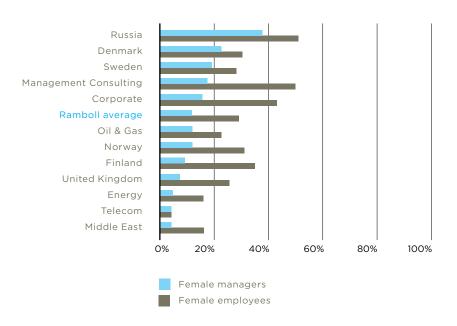
^{*}The business unit, Energy, was established 1 January 2010.

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An average of 14% of our managers are female – a slight decrease from 2010 (15%).

Over a 10 year period the number of female managers has increased from 6% in 2001 to 14% in 2011.





DIVERSITY

After having trained our HR organisation in our non-discrimination policy in 2010, we have had an open dialogue about discrimination and how we can prevent this from happening in our organisation.

We have continued these discussions in 2011 and considered how to approach diversity management. Consequently, in June 2011, we organised a one day workshop for our HR Managers' Forum with the purpose of discussing how Ramboll could work with diversity management. The workshop was split into two sessions. The first session dealt with diversity management with emphasis on the various aspects of diversity management as well as discussion on the possibility of successfully introducing diversity management as a global initiative. In the second session, specific emphasis was put on the issue of promoting female managers as Ramboll wants to be an attractive employer for both genders. However, it was stressed that diversity management addresses much more than gender issues.

After this workshop, we decided - as a step towards working with diversity management in the future - to include a diversity perspective in the review and rewriting of our global HR processes within talent development, performance management and succession planning. The review and rewriting of the processes will take place in 2012 and is linked to the implementation of a new global HR system. In this way we ensure that basic global HR processes are in place to pave the way for a more targeted approach to diversity management in the future.

CLIMATE

In Ramboll we work holistically with climate issues at both strategic and operational level. We are keen to contribute to social debate and professional discussions with our expertise on climate solutions. Ramboll is committed to adhere to the statements made by the IPCC (Intergovernmental Panel on Climate Change) and we see it as our duty to make our expert knowledge available to help reaching global climate change targets. We therefore wish to contribute to reducing CO2 emissions as well as the effects of climate change both through our consultancy and via our own activities.

In 2011, Ramboll established an internal Group Climate Panel consisting of climate experts across Ramboll with the purpose of increasing our focus on climate and providing an overall policy direction on climate issues for Ramboll. The Group Climate Panel had its first meeting in 2011 and will meet regularly in future.

CO2 FOOTPRINT

All Ramboll employees work actively to minimize our carbon footprint through our behaviour. In order to target our efforts most effectively, we have developed a specific method for calculating CO2, data collection and data quality assurance.

In 2011 we focused on establishing a new method for measuring our CO2 emissions caused by work related transport. Some of our climate experts have established the method and the guidelines for collecting the data. Now, all business units have collected data and reported their CO2 emissions from work related transport and energy use (caused by cooling, heating and electricity).

The energy results show that the emissions have not necessarily decreased compared to 2010.

MEASUREMENT CO2 EMISSIONS

	Energy use	9		Work related transport	Total CO2 emissions
BUSINESS UNIT	2011	2010	2009	2011	2011
Denmark	1.48	1.45	1.34	■ 2.03	3.52
Sweden	1.88	■ 0.76*	■ 0.76*	1.17	3.06
Norway	■ 0.79	0.46	0.43	■ 0.85	1.63
Finland	■ 0.58	0.53	0.51	1.07	1.65
United Kingdom	0.45	■ 0.64	■ 0.58	1.07	1.51
Middle East	0.70	1.30	■ 0.95	1.42	2.13
Russia	1.25	1.28	0.47	0.37	1.61
Energy	1.65	n/a**	n/a**	■ 2.58	4.23
Oil & Gas	1.19	1.14	1.21	■ 0.82	2.01
Telecom	0.67	■ 0.75***	0.75	2.06	2.73
Management Consulting	1.36	0.51	0.37	1.19	2.56
Corporate	1.43	n/a	n/a	6.18	7.61
Ramboll average	1.13	1.01	■ 0.96	1.40	2.52

■ On target ■ Partly implemented ■ Not implemented

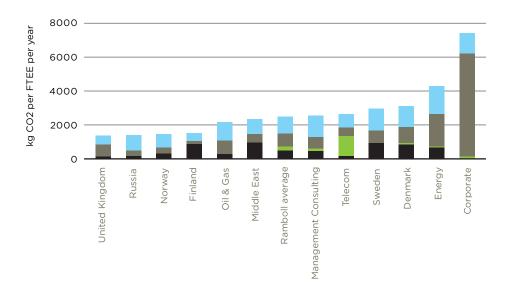
*Calculation of emission based on number of employees multiplied with factor 0.76 which is national factor in Sweden.

^{**}The business unit Energy was established 1 January 2010.

^{***}Based on 2009 calculation due to lack of valid data.



RAMBOLL CO2 EMISSIONS FROM ENERGY USE AND WORK RELATED TRANSPORT



This is mainly due to three factors. Firstly, a better validation of data, secondly, a greater consistency with our calculation methods and thirdly, we have improved the data quality by conducting a more thorough and systematic quality assurance of the data.

The total average CO2 emission per employee (FTEE) was 2.52 tonnes, the CO2 emission per employee (FTEE) caused by work related transport was 1.40 tonnes and the CO2 emission per employee (FTEE) caused by energy (cooling, heating and electricity) was 1.13 tonnes per employee (FTEE). Compared to 2010 this number increased slightly from 1.01.

In future we will continously work on improving the data validation and our CO2 emission results.

PLEASE NOTE

- For the results to be comparable across countries, the CO2 emission factors used are made by the International Energy Agency (IEA statistics, "CO2 Emission from fuel combustion highlights", 2011 edition).
- FTEE is an average of FTEE in period July 2010 to June 2011, however, the month July 2010 has been replaced by the August 2010 FTEE figures, and January 2011 has been replaced by February 2011 FTEE figures due to lack of reporting in these months.

Business Unit specific notes

Denmark:

- The slight increase in energy use is due to a general increase in consumption. Norway:
- The energy use increase in 2011 is due to a more exact calculation in 2011.
- · Consumption from rental cars, public transport and ferry not reported.

Sweden:

- The energy use increase in 2011 is due to a more exact calculation in 2011. Finland:
- The slight increase in energy use is due to a general increase in consumption.
- Consumption from rental cars not reported.

United Kingdom:

- Heating consumption not reported
- Consumption from company cars, private cars, rental cars, taxi and ferry not reported.

Middle East:

Consumption from the Abu Dhabi office not reported.

Russia:

- The considerable increase in energy use from 2009 to 2010 is due to new office facilities.
- Consumption from private cars not reported.
- Do not use rental cars

Management Consulting:

• The considerable increase in energy use is because all international units are now included in the result. In 2009 and 2010 the results were based on energy use in Denmark only.

- 19 employees in one office in Sweden are not included in the reporting. Oil & Gas:
- Consumption from taxi, rental cars and ferry not reported.
- Consumption from private cars in Qatar, Abu Dhabi, India, Copenhagen and Esbjerg not reported.
- Do not use company cars and public transport in India.
- Consumption from airplane in Norway and Abu Dhabi not reported.

Telecom:

- Consumption from company cars and rental cars in Denmark not reported.
- Do not use private cars, rental cars and ferry in India IMI.
- Consumption from private cars and public transport in Indonesia not reported.

TAKING A HOLISTIC APPROACH

ACTIVITIES

SUSTAINABLE AVIATION BIOFUEL

Ramboll in Norway has been engaged by Avinor, the organisation responsible for planning, developing and operating the Norwegian airport network, to investigate opportunities for sustainable and profitable synthesized bio jet fuels for civil aviation in Norway.

"What really motivates our project team is the possible CO2 emission reductions for the airlines, but also for Norway as a nation. This is an innovative project investigating new technologies, future resources such as algae and business concepts, which makes the project even more exciting," says project manager Magnus Killingland, Ramboll.

The project is an example of how technologies, if used correctly, can help solve today's environmental challenges.

Many stakeholders involved

The project is challenging as it will involve several external stakeholders. Ramboll will organize meetings and seminars with entrepreneurs and companies wishing to develop new technologies. This includes biomass producers, government institutions, European airlines and environmental NGOs, as well as research and academic communities both in Norway and abroad to highlight all the challenges for sustainable biofuels.

Reducing CO2 emissions despite growth in air traffic

To reduce CO2 emissions despite strong growth in air traffic, Avinor aims to ensure that Norwegian



aviation will stabilise and then reduce CO2 emissions. In addition to energy-efficient engines and new airplanes, the replacement of fossil fuels with sustainable biofuels can reduce CO2 emissions caused by aviation.

The whole value chain, from resources and feed stocks to the establishment of production facilities for biofuels in Norway, will be analysed with a thorough review of different technologies. The focus is on sustainable production, and initially production of certified biofuels, both in terms of sustainability and requirements for jet fuels in general.

THE MAIN TASKS IN THE PROJECT

- To investigate publications from leading research and knowledge institutions in Europe
- To explore opportunities for biofuel imports and profitable biofuel production in Norway
- Define work packages and procure expert reports, either from the Ramboll Group or externally
- Establish a reference group with the relevant authorities, research institutions, environmental organisations and industry
- Report to a steering committee with Avinor and airlines

A final report on the findings will be submitted by the end of November 2012.



ENABLING KNOWLEDGE SHARING

We want to be at the forefront of the development of environmentally friendly technologies and for this reason it is important to share knowledge on this issue with both external and internal experts. In Ramboll we have a large number of internal networks including a network for sustainable buildings, master planning and urban water.

On 13-14 October 2011, 100 Ramboll experts within sustainable buildings met at the inaugural Sustainable Buildings Network Conference in Copenhagen. The event was organised to encourage crosscompany networking, knowledge sharing and to define future policy objectives in this area. One output from the conference is a policy white paper entitled 'Engineering our Future – Ramboll Sustainable Building Design.'





CREATING INSPIRING LEARNING SPACES

School projects offer Ramboll a unique challenge. Through innovative design we are able to create vibrant learning spaces with strong sustainability credentials. Sustainability has many definitions. At Ramboll, we use the United Nations' holistic definition of sustainable development. We do not see buildings as isolated sustainable systems – we see them as part of neighbourhoods and cities.

Design elements can interplay with curriculum delivery creating imaginative, informative and inspiring environments that contributes to children's wellbeing. Here are just a few examples of sustainable school projects where Ramboll has been involved as consultant.

Ashmount primary school, Crouch Hill, Islington, UK

The project at Crouch Hill Community Park involved the relocation of Ashmount Primary School, Bowler's Nursery and the renovation of the community Cape building. The primary school caters for school ages from 3 to 11 and currently has 340 pupils enrolled.

The project has a challenging brief as the site is metropolitan open land. Sustainability, energy and landscaping have all been integral to design development. The school aesthetics are based on a 'tree house' concept to connect with the surrounding environment. Biodiversity will be enhanced at the site, with plans to regenerate the entire park.

The project is set to achieve the highest BREEAM₁ 'Outstanding' rating, with zero carbon emissions during operation and zero waste during the demolition, construction and operation of the development.



01-02 One of Finland's first schools with environmental certification, Axxell vocational school in Karjaa, is a modern and sustainably designed teaching facility. 03 Ashmount primary school. 04-05 Active-house nursery, Hørsholm.







04

Axxell vocational school, Karjaa, Raasepori, Finland

Ramboll was closely involved in the planning of a new building for the Axxell vocational school. The school building is built in Karjaa, Raasepori in southern Finland and it was one of Finland's first school buildings with environmental certification.

The aim was to build a modern, efficient and appropriate teaching facility for Axxell as well as a sustainably designed and constructed building, which can serve as a practical example for the students. This energy-efficient and environmentally friendly building has been fitted with the latest technologies within heating, lighting and electricity. The building will attempt to achieve a LEED₂ Gold-certification, and serves as Ramboll's pilot project for LEED consultancy services in Finland.

"The location of the modern school building was carefully chosen near the main railway next to Karjaa station, to make it easy to reach the school by public transport. Energy efficiency was emphasised from the very beginning of the project in the premises strategy and project planning," says Frej Werner Project Manager, Ramboll.

Axxell's new vocational school will accommodate 500 students, youngsters and adults. The floor area of the building is 12,500 square metres and the volume 55,000 cubic metres. Construction began in April 2010, and the building was inaugurated in October 2011.

First active-house nursery, Hørsholm, Denmark

Working in conjunction with Christensen & Co Architects, Ramboll has prepared the design of an unusual building that fuses energy efficiency with new and inspiring architecture. The nursery, 'Solhuset', is a building based on the 'Active House' principals; which refer to the building's ability to produce energy, its comfortable

indoor climate as well as its interaction with the surroundings and nature. The Danish construction magazine, Byggeri, has selected Solhuset as the best building of the year in the 'Open Category'.

The building is a pioneering example of the energy producing and healthy nurseries of the future, and is the first so-called Active House in the world that is made for children. An Active House is a building that reduces energy consumption, and Solhuset demonstrates how good energy design can create a surplus of energy from sustainable energy sources, while at the same time allowing plenty of daylight and fresh air in the indoor environment.

1 Definition: Building Research Establishment Environmental Assessment Method

2 The Leadership In Energy and Environmental Design (LEED) Green Building Rating System is an independent certification program that provides voluntary guidelines for developing high-performance, sustainable buildings



CARE FOR THE COMMUNITY

As a company with a strong commitment to society, Ramboll is also obliged to contribute to improving the situation for some of the world's most vulnerable people. We want to help where we can and also support non-profit organisations in relation to humanitarian aid and development projects

Engineers Without Borders

In 2011 Ramboll donated approx. EUR 27,000 to the organisation 'Engineers Without Borders' (EWB). The organisation is responsible for providing emergency relief to people affected by natural or manmade disasters and offering engineering expertise to development projects as part of rebuilding communities – all on a voluntary basis.

The donation was used for three things. Firstly, for repairing roads

and bridges in Liberia to access the border region where thousands of refugees from the civil war in the Ivory Coast are situated. Secondly, it was used for water pumps at Lake Victoria in Africa to supply drinking water to arid villages and to irrigate the area. Thirdly, it went to fact finding in relation to cyclone shelters in Bangladesh.

At Ramboll, we want to do meaningful work, and therefore we support EWB. We encourage our employees to join EWB as this is a genuine way for engineers to make a difference.

Ramboll engineers contributing their time for free

The Charity Task Group - organised by employees in the UK - supports many charitable jobs in the local community for example structural design of a school in Zambia. Ramboll employees are contributing their spare time to deliver planning or engineering services on a pro bono basis.

"We have the opportunity to truly employ multidisciplinary working alongside our core values of sustainability and protection of the environment, and assisting local community activities. Combined with this our engineers and technicians will be involved at a hands-on level that is often not available to us under more commercial projects", says Jeremy Foster, leader of the Charity Task Group.

In 2011, the Charity Task Group organised and launched the scheme 'Donate one paid working day for free'. All employees in the UK were invited to donate one paid working day to a charity of their own choice helping a good cause.





DONATIONS

The Ramboll Foundation, the main owner of Ramboll, has made several donations to non-profit organisations in 2011:

- EUR 13,500 to the Norwegian People's Aid's work in demining, removing cluster munitions and other remnants of war around the world
- EUR 100,000 to help the countries in the Horn of Africa suffering from the worst drought since 1951.
- EUR 13,500 to the twelve largest humanitarian organisations in Denmark for their mutual mission to allocate funds for projects supporting young Africans and their future.

01 Local workers repair an impassable road in the border region in Liberia, in coorperation with Engineers Without Borders. 02 Engineers Without Borders repairs and rebuilds roads and bridges in Liberia with support from Ramboll.



MIND YOUR OWN BUSINESS

In Denmark, Ramboll acts as business mentor for young ethnic boys participating in the project 'Mind your own business'. The project is initiated by the Danish Refugee Council (DRC) and sponsored by the Tryg Foundation. The purpose is to strengthen ethnic minority boys' professional and social skills and relations.

Eight micro-enterprises are being created, run and managed

by young ethnic boys with entrepreneurial spirit. In conjunction with DRC, business mentors, support from schools, volunteers and partners, the boys are learning business by doing business. The intention is to encourage the boys to use their entrepreneurial experience from the project to start an education and to build a network within the business world.

With the help of business plans, marketing, product development and mentoring, 35 boys have learned how to run their own business. Ramboll - headed by Kurt Nielsen-Dharmaratne - was business mentor for the team that won the competition with

the micro-enterprise 'Shop'N Wash'. The premise for the business is washing people's cars whilst they are shopping groceries in the supermarket – saving time for the customers.

For Ramboll it was a perfect opportunity to participate as mentor in the project. We are involved in many projects in social housing areas and we are often in contact with the same issues that the DRC is working with. Also we want to be an active part of the community in which we work.







Ramboll employee Kurt Nielsen-Dharmaratne was business mentor for a team of young ethnic boys taking part in the 'Mind your own business' project.

GROUP WORKS COUNCIL

The Ramboll Group Works Council is responsible for consulting and informing employees in relation to strategic decisions taken by Ramboll companies covered by the Agreement for Guidelines and Procedures for the Ramboll Works Council. The Ramboll Works Council, which consists of employee representatives from all business units, met with the Group Executive Board on 1 December 2011 in Copenhagen.

The following issues were discussed at the meeting:

- Finance and strategy
- Important organisational changes
- Overall employment situation
- General development order backlog and changes in activities
- Large investments
- Corporate responsibility
- Ramboll Share Scheme



HUMAN RIGHTS IN DUBAI

In February 2011, the Danish NGO, Danwatch, published a report on working conditions for migrant workers in Dubai's construction industry. The report documented that two large contractors, Arabtec Construction and Al Habtoor Leighton, with whom Ramboll worked on eight projects in Dubai, violated the rights of the construction workers they employed.

This story found its way to the Danish media on 21 February 2011 and the days after, with about 60 articles in newspapers, magazines, television and on the internet. The incident had impact on Ramboll's image in Denmark.

The two contractors mentioned took part in construction projects where Ramboll was involved as a consulting engineer for the developer. In other words, no contractual relationship existed between the contractors and Ramboll.

The core element

The allegations against Ramboll stated that by silent complicity we supported the violation of human rights and were indirectly responsible for the behaviour of the contractors. As such, Ramboll failed to comply with the 2nd principle of the UN Global Compact:

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

Through the UN Global Compact, we are obligated to respond to the actions of collaboration partners to whom we are not connected contractually.

Lessons learned

We must admit that we were

not well enough prepared for the consequences of our commitment. Our focus was on business integrity, and human rights was not included in the risk assessment of our projects.

We had not succeeded in making our employees fully aware of what our commitment really means - securing the right business behaviour also in relation to human and labour rights. And we also learned that what happens in one market can have major effects on other markets - a consequence of being a global company.

Actions taken

We continuously strive to live up to the UN Global Compact. This is a process which means that we continuously launch initiatives that strengthen our alertness and procedures in accordance with the principles in the UN Global Compact, and we will seek to implement them whenever we have the opportunity to influence.



Based on our experience from Dubai, we have established a more systematic approach to issues concerning human rights including an 'Obligation to Act' policy to guide our employees on ethical business behaviour.



If, through any of our projects, we encounter problematic circumstances of a professional or business ethical nature- including matters concerning human rights - it is always our duty to actively make our customer or business partner aware of this. If we find that the actions taken do not live up to our expectations, we have to reconsider the basis for further collaboration with the customer or business partner.

Our experience from Dubai has given us reason to establish a more systematic approach in relation to issues concerning human rights. We have introduced the policy 'Obligation to act' to guide employees on what they must do and why it is important. The policy also outlines a 'policy statement' that we must be proactive in communicating to all customers (see page 5 and 26).

INDUSTRY RESPONSIBILITY

The risk and challenges we face in the area of human rights are not specific to Ramboll but apply to our whole industry. In addition, professional consultancies are experiencing increased sustainability requirements from customers and society.

The engineering industry's focus has been on business integrity, but what about human rights, labour rights and the environment? Increasing globalisation challenges our profession in relation to sustainability – do we have the right attitudes and structures in place to act responsibly?

The International Federation of Consulting Engineers (FIDIC) held its annual conference in October 2011, which was a perfect opportunity for Ramboll to engage in dialogue with industry peers on these issues. Flemming

Bligaard Pedersen, Ramboll's CEO, participated as a speaker and emphasised that common policies and procedures should be established to ensure sustainable growth within our industry. Taking a point of departure in Ramboll's experience from Dubai, a constructive discussion took place and all delegates agreed that it is a general industry issue. Based on Ramboll's best practice, FIDIC decided to review industry guidelines and incorporate aspects of human rights, labour rights and the environment into these guidelines. The revised guidelines are expected to be ready in 2012.

Ramboll has also engaged with other industry associations such as DI (Danish Industry) and FRI (the Danish association of consulting engineers) on how consulting engineers can ensure a responsible cooperation with customers, partners and suppliers.

WE BELIEVE
IN A BUSINESS
BEHAVIOUR
BASED ON TRUST,
TRANSPARENCY,
INTEGRITY AND
PROFESSIONALISM

BUSINESS INTEGRITY

Our Code of Conduct is the backbone of our approach to business integrity. We have a set of tools that help us uphold the Code of Conduct that include training programmes, a Whistleblower and a CR management system as part of our quality management procedures (see page 22 and 26).

TRANSPARENCY CREATES AWARENESS

As a fourth element of the CR Management System, we trained all employees in Business Integrity in January 2011. The purpose was to increase awareness of the reason why we have a Code of Conduct, how it influences our daily work and what we should do to maintain our ethical standards for business behaviour.

The training was developed as an e-learning training course related to our own industry. The training starts with a pre-test where employees can test their present knowledge of business integrity in Ramboll. The training continues with information on our Code of Conduct and Code of Practice and the reasons why it is important. Then the training takes the employee through three fictional dilemmas related to our business. In each dilemma, the employee must evaluate and decide which solution is the best. Information is then given on business integrity tools and where to find more information. Finally, as the most important part, the training ends with a post-test consisting of the same questions as in the pre-test, which gives the employees the opportunity to see where they have improved their knowledge.

All employees were automatically signed up to the course which made it possible for us to measure the participation rate (see figure 04 on page 23). We were pleased that so many employees participated in the business integrity training, and we have subsequently included the online training in introduction packages and induction programmes for new employees.

WHISTLEBLOWER

Our Group Whistleblower is a tool for employees to make anonymous reports about matters that they believe are ieopardising our business integrity and contravene our Code of Conduct. But the Whistleblower can also be used to report other issues such as quality or financial misconduct, or unfair treatment of employees. The Whistleblower is accessed through Ramboll's intranet, where it is possible to send an anonymous message directly to our Group CEO. However, we encourage people to identify themselves as it is then possible to have a dialogue and to get a better understanding of the situation. We also encourage people to provide sufficient detail about the matter to be able to investigate the situation properly. All reports are taken seriously, investigated and handled with discretion.

In 2011, we have had nine Whistleblower reports. All of which have been investigated carefully and measures have been taken. Eight reports have been investigated internally and one report has been investigated by an independent external investigator.

SUBJECT AND NUMBER
OF WHISTLEBLOWER REPORTS

Values	1	
Code of Conduct	1	
HR	6	
IT	1	
Total	9	

CR MANAGEMENT SYSTEM

Our CR management system, which among other issues focuses on business integrity has been developed according to industry guidelines and composed of six elements (see list of elements). In 2011 we conducted training according to the 4th element and established audit and management review procedures according to the 5th and 6th element - now all elements of the system are implemented. In 2012 all business units must submit their documented CR management review to the Group Executive Board.

01 MEASUREMENT CODE OF CONDUCT

BUSINESS UNIT	2011	2010	2009
Denmark	•	•	•
Sweden	•	•	•
Norway		•	•
Finland	•	•	•
United Kingdom	•	•	•
Middle East	•	•	•
Russia	•	•	•
Management Consulting	•	•	
Oil & Gas	•	•	•
Telecom	•	•	•
Energy			n/a*

02 APPOINTMENT OF A CR ORGANISATION

BUSINESS UNIT	2011	2010	2009
Denmark	•	•	
Sweden	•	•	•
Norway	•	•	•
Finland	•	•	•
United Kingdom	•	•	•
Middle East	•	•	•
Russia	•	•	•
Management Consulting	•	•	
Oil & Gas	•	•	•
Telecom	•	•	•
Energy	•	•	n/a*

■ On target ■ Partly implemented ■ Not implemented

ELEMENTS

- O1 CODE OF CONDUCT
 Ramboll values, Code
 of Conduct, Code of
 Practice, standards and
 more detailed instructions
 are communicated and
 explained to all employees.
- O2 APPOINTMENT OF A
 CR ORGANISATION
 A top management CR
 representative and a CR
 manager/coordinator are
 appointed for all business
 units. Channels for
 communication are defined.
- O3 CR PROCEDURES
 FOR SCREENING AND
 MANAGING PROJECTS
 Procedures for identifying
 (screening) and managing
 CR critical projects are
 implemented in quality
 management procedures.
- O4 TRAINING IN
 BUSINESS INTEGRITY
 Employees are trained
 in business integrity
 and how to use the CR
 management system.
- O5 CR AUDIT
 Audits monitor and
 document whether CR is
 implemented in the project
 processes and if corrective
 and preventive actions are
 completed successfully.
- O6 CR MANAGEMENT REVIEW
 At least once a year the
 management reviews
 the CR procedures for
 suitability, adequacy and
 effectiveness, and decides
 actions for improvement.

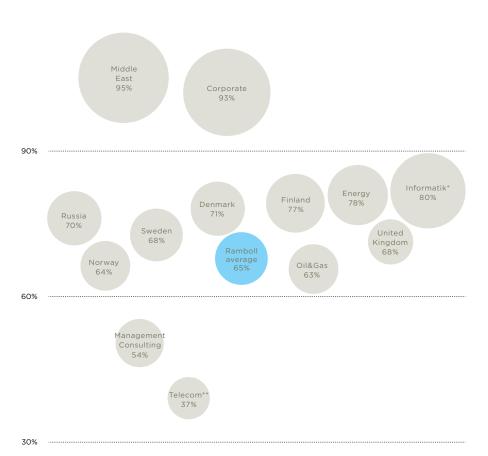
^{*}The business unit, Energy, was established 1 January 2010.

03 MEASUREMENT CR PROCEDURE FOR SCREENING AND MANAGING PROJECTS

BUSINESS UNIT	2011	2010	2009
Denmark	•	•	
Sweden		•	•
Norway		•	•
Finland		•	•
United Kingdom		•	
Middle East		•	
Russia			
Management Consulting	•	•	
Oil & Gas		•	•
Telecom			•
Energy	•	•	n/a*

lacksquare On target \lacksquare Partly implemented \lacksquare Not implemented

04 TRAINING IN BUSINESS INTEGRITY % OF EMPLOYEES WHO PARTICIPATED IN BUSINESS INTEGRITY TRAINING



^{*}The Informatik business unit was divested of Ramboll in 2011.

^{*}The business unit, Energy, was established 1 January 2010.

^{**}The actual number of employees completed training is assumed to be higher due to an inadequate IT platform in India in 2011.

05 MEASUREMENT CR AUDIT

BUSINESS UNIT	2011
Denmark	•
Sweden	•
Norway	
Finland	•
United Kingdom	•
Middle East	•
Russia	
Management	•
Oil & Gas	•
Telecom	•
Energy	•

■ On target ■ Partly implemented ■ Not implemented

06 MEASUREMENT

CR MANAGEMENT REVIEW

BUSINESS UNIT	2011
Denmark	
Sweden	•
Norway	•
Finland	•
United Kingdom	•
Middle East	
Russia	
Management	
Oil & Gas	•
Telecom	
Energy	

■ On target ■ Partly implemented ■ Not implemented

BUSINESS PARTNER RESPONSIBILITY

In the past years we have experienced that the requirements to us as a professional community consultant are increasing and today include expectations on us in matters outside the ordinary scope of our services. Consequently, we need to continuously improve our performance and maintain our reputation as a strong responsible partner and supplier.

SUPPLIERS AND CONSORTIUM PARTNERS

As part of Ramboll's focus on responsible cooperation with business partners, a Group policy on our own suppliers, subconsultants and consortium partners has been established covering all business units in Ramboll. As part of the policy, we now have requirements on all our suppliers, sub-consultants and consortium partners in the form of a common set of corporate responsibility (CR) standards. These standards are compiled in a Suppliers' Declaration.

The purpose of the Suppliers'
Declaration is to ensure that our
suppliers and partners understand,
accept and commit to Ramboll's
standards for good governance and
business behaviour. The standards
are based on UN Global Compact's
internationally recognised
ethical principles in the areas of
human rights, labour rights, the
environment and anti-corruption as
well as Ramboll's Code of Conduct.

All suppliers and partners with whom Ramboll enters into contract must sign the Suppliers' Declaration as part of or as a supplement to the contract. Our screening and



assessment of suppliers now include these standards as well.

Ramboll must proactively cooperate with our suppliers, sub-consultants and consortium partners on Ramboll's CR standards in order to promote sustainable development and good corporate citizenship, and to improve performance. Engaging with our suppliers, sub-consultants or consortium partners to improve performance in the cases where these standards are not met will benefit all involved parties and society at large. As a last resort, we may need to terminate business if the company in question continuously fails to comply with a corrective action plan.

CUSTOMERS

Ramboll wishes to be a trusted and responsible partner to our customers. We want to comply with our customers' standards and help our customers in reaching sustainable goals.

MONITORING SUPPLIER STANDARDS

Corporate responsibility standards for suppliers are not completely new in Ramboll, but merely an extension that now covers all our suppliers. Since 2002, Ramboll has been a supplier of cost efficient guyed masts, towers and monopoles for telecommunication. Ramboll has a network of eight reliable steel manufacturer sub suppliers in countries such as India, China, Poland and Portugal that are all fulfilling our standards. The structures are manufactured according to EN 1090 or similar by highly skilled craftsmen and certified welders. We ourselves select, develop and train new factories to fulfill our standards. Ramboll's production experts are supervising the production and responsible for the complete documentation. Based on our experience, especially quality of masts and towers, and workplace health and safety issues need to be monitored closely.

MEASUREMENT

ADAPTED QUALITY MANAGEMENT PROCEDURES

The existing Business Integrity Management System is adapted to include aspects of human rights, labour rights and the environment. The system is renamed CR Management System.

BUSINESS UNIT	2011
Denmark	
Sweden	•
Norway	•
Finland	
United Kingdom	
Middle East	
Russia	
Management	
Oil & Gas	
Telecom	
Energy	•

■ On target ■ Partly implemented ■ Not implemented

As a community consultant, Ramboll is faced with challenges not only in our supply chain, but also - and to a larger extent - in relation to our customers and the projects we work on. We want to work with customers who agree to and do not violate international principles on human rights, labour rights, the environment and anti-corruption and we want to influence our customers' opinion, actions and

As mentioned on page 5 we launched the policy 'Obligation to act' in 2011 - with the purpose of having a more proactive and systematic approach towards our customers and business partners in relation to specific matters violating our Code of Conduct or internationally recognised ethical principles.

choices in the right direction.

In this way we are communicating our policy statement to our customers, and in 2011 we have sent letters from our Group CEO to more than 5000 customers explaining Ramboll's obligation as a community consultant. This was an opportunity to engage with our customers on other terms than usual. In future, we will explain the same to new customers either as part of the tender process, included in the agreement or by letter from Ramboll.

MANAGEMENT SYSTEMS

To make our new Group policies and standards related to customers, suppliers and partners operational, we have implemented new and adapted procedures in our quality management systems.

The scope of our business integrity management system (BIMS) have now been expanded to include standards of human rights, labour rights and the environment, and is not limited to bribery, extortion, fraud and collision as previously.

The system has therefore been renamed and is now called the CR management system (see page 22).

In addition to adapting existing procedures in our management systems such as our manuals, project risk assessment and CR file, we have introduced new procedures related to tender and agreements and established an internal Group CR list where companies – that being either customers, suppliers or partners – are listed and shared internally if they are considered to be CR critical.

COUNTRY HEAD OFFICES



01 BELGIUM, Brussels 02 CYPRUS, Episkopi 03 DENMARK, Copenhagen 04 ESTONIA, Tallinn 05 FINLAND, Helsinki 06 GERMANY, Hamburg 07 GREENLAND, Nuuk 08 INDIA, Hyderabad 09 LATVIA, Riga 10 NORWAY, Oslo 11 POLAND, Warsaw 12 QATAR, Doha 13 SINGAPORE 14 ROMANIA, Bucharest 15 RUSSIA, St Petersburg 16 SAUDI ARABIA, Riyadh 17 SOUTH AFRICA, Pretoria 18 SWEDEN, Stockholm 19 SWITZERLAND, Zurich 20 UAE, Dubai 21 UK, London 22 USA, New York

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