

COMMUNICATION
ON PROGRESS

2014

2014 UN GLOBAL COMPACT



COWI



< COWI participates in the EU-funded initiative “Smart Cities and Communities” with the “READY” project aiming to promote green urban development. Over the course of five years, the project team will test a palette of energy-efficient technologies in practice, ranging from smart solutions for low-temperature district heating and local storage, over new components such as PVT solar panels, to ICT systems that send out command signals, allowing the project to test flexible energy systems.

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PUBLISHED BY
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COWI is a leading consulting group that creates value for customers, people and society through our unique 360° approach. Based on our world-class competencies within engineering, economics and environmental science, we tackle challenges from many vantage points to create coherent solutions for our customers – and thereby sustainable and coherent societies in the world.

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EDITORIAL INPUT ENDED
February 2015.

COVER ILLUSTRATION
The extension of Denmark's Moesgaard Museum has been constructed to meet the criteria of the Danish low-energy class 2015, making it one of the most energy-efficient museums in the world. This means that the building may consume around half of the energy prescribed by current Danish building regulation. COWI was consultant on energy efficiency, lighting design, acoustics, indoor climate, structures, fire and sustainability on the project.

COMMITMENT FROM OUR CEO

COWI's core competencies within engineering, economics and environmental science result in our involvement in nearly 13,000 ongoing projects every year. We recognise that our actions impact our stakeholders and the environment at large.

In our service delivery, we are constantly aware that environmental and social responsibility has become one of the main focus areas for our customers, and new legislation and emerging voluntary standards can limit market access for companies that do not offer sustainable products or operate in a responsible manner.

COWI incorporates sustainability into our business activities by using and developing methods and technologies that facilitate more efficient use of limited natural resources. We also continue our work to ensure that we do not impact human rights negatively and at the same time increase the value of our employer brand through being a diverse workplace with opportunities for all.

It is imperative for us that our solutions continue to create value and have a positive impact for our stakeholders and society.

We are fully and continuously committed to the United Nations Global Compact and this Communication on Progress report is produced with reference to the ten principles of the Sustainability Reporting Guidelines.

A handwritten signature in black ink, appearing to read 'Lars-Peter Sobye', with a long horizontal flourish extending to the right.

Lars-Peter Sobye, President, CEO



SUSTAINABILITY AND CSR IN COWI

OUR APPROACH

Through our services, we contribute to sustainable development.

COWI's approach to corporate social responsibility (CSR) and sustainability is to strive for benefits for our customers, key stakeholders, the company and society. This is an ongoing process and we continue to learn new ways of dealing with the opportunities and dilemmas faced.

We work through a three-pronged approach where we integrate CSR and sustainability into:

- › Business conduct: The way we carry out our own activities.
- › Employee behaviour: The way we behave at the workplace and our obligation to act.
- › Business deliverables: The way we ensure that the solutions we design for customers consider environmental and community impacts.

While our biggest potential for reducing environmental impacts lies in our service delivery and in the solutions we develop with and for our customers, we also focus on sustainable operations of our own facilities and offering tools that allow our employees to reduce their climate footprint.

Our commitment to sustainability and corporate social responsibility is an extension of our fundamental values and builds on our vision and mission. The commitment is also reflected in our support of the UN Global Compact, the FIDIC Code of Ethics and the UN Caring for Climate initiative.

Also, COWI wants and needs to be among the most attractive employers for professionals looking for a career within the consulting industry. We believe that promoting diversity and cultivating

an ethical culture are both critical in our efforts to achieve this goal.

COHERENT SOLUTIONS TO MEET GLOBAL CHALLENGES

COWI delivers solutions, knowledge and ideas for development of the modern world and the challenges it faces – among these, balancing sustainable growth and preserving efficiencies. Sustainability is ingrained in our foundation and a key competitive factor for COWI.

One set of challenges are related to high urbanisation rates across the world, with ensuing pressure on infrastructure, water, energy and health care. As examples of this approach, COWI has built tunnels to connect power plants to the supply network in Copenhagen to minimise energy waste and costs, secured clean wastewater in Saint Petersburg, and is heavily involved in developing light-rail solutions in Norway and Denmark.

Further challenges are climate change and environmental degradation, which constitute threats that need to be overcome by, for example, low-consumption buildings, security measures against adverse weather and recovery of contaminated land. COWI has worked to secure coastal areas in the Northeastern USA by establishing floodgates. We employ measures to reduce energy consumption by up to 75 per cent for new buildings. We are also among the top suppliers of solutions for waste and contaminated sites.

Together with our customers, COWI's specialist competencies are part of the process of invention and innovation that is needed to meet these global challenges. This is at the core of our services

and our business model, and it is where we have the greatest sustainability impact.

INTEGRATION INTO BUSINESS PROCESSES

To mitigate risk, we apply, as an integrated part of our quality system, a project screening tool considering health and safety, as well as security, environmental, social and community outcomes for projects in Denmark and in our Bridge, Tunnel and Marine Structures organisation.

Furthermore, to ensure that COWI's extensive knowledge is implemented across the business, technologies and methods used and developed in one project are gathered for application in other projects.

THIS REPORT

We have developed a number of policies and guidelines on sustainability and CSR, which set out the overall framework for how we work on a daily basis. These policies and guidelines are described in this report, and underpin the strong correlation that exists between our values and our business practices.

The report serves as the required annual Communication of Progress for the United Nations Global Compact (UNGC). As such, its content is structured around the ten principles of the UNGC. Moreover, the report serves to fulfil the requirements of Danish law and contains the green accounts for our Danish company, and describes our activities within environment, human rights and social responsibility.



AT THE END OF 2014, COWI HAD
POLICIES CONCERNING THE
FOLLOWING AREAS:

Sustainable development

Business integrity

Safety and health

Diversity and inclusion

Whistleblower hotline

Responsible supplier management.

All policies are available at
www.cowi.com/sustainability and
www.cowi.com/policies

< In 2014, COWI together with six consortium members was awarded a framework contract by Danida – the Danish development cooperation. The contract involves the development of up to 22 new country programmes in Africa, Latin America and Asia that will all support a higher purpose of reducing poverty and improving human rights, including democracy and governance issues, green growth, social progress, stability and protection.

HUMAN RIGHTS

01 PRINCIPLE:
Businesses should support and respect the protection of internationally proclaimed human rights.

02 PRINCIPLE:
Businesses should make sure that they are not complicit in human rights abuses.

WORKING WITH HUMAN RIGHTS

We believe that support of human rights are rooted in the company culture and reflected in one of our five guiding values, 'respect', which states:

"We respect those we work with, nature and society. We respect each other in decision-making and implementation. We respect friendship across the organisation, independent of the hierarchy."

Through our policy on sustainable development, we integrate human rights in our business. In the policy, we commit ourselves to taking social aspects into consideration when performing assignments, and to enhancing our employees' attention to and knowledge of social conditions in order to further sustainable development in all our activities.

This policy is integrated into our risk assessment and training systems, through which we continue to raise awareness of the importance of COWI not contributing negatively to human rights in our external activities, including the work we do for customers, our procurement practices and our partners. Internally, the main focus is on the right to a safe workplace, with our health and safety policy as the overall guide.

DEALING WITH HUMAN RIGHTS ON PROJECTS

Adequate employee conditions and compliance with human rights are

important to COWI. To ensure that human rights violations do not take place on projects in which we are involved, we operate according to three procedures:

- › **DUE DILIGENCE**
COWI performs a screening to uncover human rights risks before entering into a project. The process helps identify potential negative human rights impacts on a specific project, giving us the chance to back out in time.
- › **SUPERVISION**
COWI offers supervision of safety and health conditions on site. This allows us to ensure that internationally accepted standards are enforced on a project.
- › **OBLIGATION TO ACT**
Employees at COWI have the so-called obligation to act, meaning that everyone is obligated to act if they see human rights being violated on a project. Employees may either directly contact the customer, their manager or use COWI's whistleblower hotline.

All new employees are introduced to these three procedures as part of COWI's onboarding programme, and the procedures are included in our training.

DUE DILIGENCE WHEN PREPARING PROPOSALS

As part of COWI A/S's quality management system, our project managers screen for risks of human rights violations before bidding on

a project. If this risk is seen as too high, we do not bid on the project. In other cases, mitigating actions are implemented.

The most relevant human rights issues within our line of business, which we screen for systematically, include:

- › Physical conditions and indoor climate (temperature, air quality, noise, degassing etc.)
- › Ergonomics (working posture, heavy lifting)
- › Chemical and biological conditions (gases, particles, fibres, dust, liquids)
- › Risks of accidents
- › Safety coordination during design and execution (responsibilities and roles)
- › Damage to third parties (mechanical, electrical, thermal, noise etc.)
- › Migration, relocation/rehousing of residents
- › Impact on local community (neighbours and indigenous groups)
- › Social and environmental risks in the supply chain (including human rights violations, employee rights and forced child labour).

This list is updated regularly to keep up with developments.

KEY ACTIVITIES AND OUTCOMES

Since 2012, COWI has had a sustainable procurement system, which is now used in Denmark, Sweden and Norway. Through the system, we assess suppliers on human and labour rights, ethical

standards, social and environmental policies, health and safety, diversity and anti-corruption. We store all information concerning every supplier in our system, meaning that the entire organisation has access to all relevant supplier information.

In 2014, another 96 suppliers were assessed, approved and included in the system.

HEALTH AND SAFETY WORK

The work on health and safety in 2014 focused on the psychosocial working environment and the prevention of work-related stress as well as supervisory work on construction sites. The risk of physical work injuries is very low. In 2014, three injuries with absence from work were reported.

While we have no data on the occurrences of absences due to work-related stress, we are aware that with a highly committed work force this is a risk area.

We have designed and implemented a solid programme to prevent stress or bring people back to their jobs in cases of debilitating temporary stress.

POLICY/GUIDELINE: DUE DILIGENCE

Employee conditions and compliance with human rights are important to COWI. To ensure that we detect any human rights violations on projects which we are involved in, we operate according to three procedures:

- › Due diligence: COWI performs a screening to uncover human rights risks before entering into a project. The process helps identify violations of human rights on a specific project, allowing us to back out in time.
- › Health and safety supervision: COWI seeks to increase our influence on project sites by offering supervision of safety and health conditions. This allows us to ensure that internationally accepted standards are enforced on a project.
- › Obligation to act: Employees at COWI have the so-called obligation to act, meaning that everyone is obligated to act if they see human rights being violated on a project.

The three procedures are included in our project management training and COWI's onboarding programme.

POLICIES: HEALTH AND SAFETY

COWI strives for a safe and healthy working environment, both in our own operations and in our assignment-related activities.

To meet our objectives, we will:

- › ensure that a safe working environment is not compromised for economic or productivity reasons.
- › ensure that project managers instruct their teams on specific project-related health and safety risks and necessary preventive measures. This includes the use of personal protective equipment.
- › provide employees with an opportunity to influence their own working environment in dialogue with management.
- › comply with relevant health and safety legislation and standards.
- › inform our customers and business partners if we find violations of health and safety standards, labour rights, human rights or unnecessary or illegal environmental degradation on projects in which we are involved.

POLICIES AND PRINCIPLES RELATING TO HUMAN RIGHTS

COWI's value on respect

FIDIC Code of Ethics, adopted by COWI

Policy on health and safety

Policy on sustainable development

All policies are available at www.cowi.com/sustainability and www.cowi.com/policies

LABOUR RIGHTS

03

PRINCIPLE:

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

05

PRINCIPLE:

Businesses should uphold the elimination of all forms of forced and compulsory labour.

04

PRINCIPLE:

Businesses should uphold the effective abolition of child labour.

06

PRINCIPLE:

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

WORKING WITH LABOUR RIGHTS

The more than 6,000 people working for COWI are provided with working conditions in line with international labour rights.

We support and practise diversity and equal opportunities, our employees are free to organise and bargain collectively as they wish, and they are all paid a fair wage. COWI dissociates itself from all kinds of child labour, and with the skill level required to work for us, there is no evident risk of child labour.

The main challenge for COWI in terms of labour rights is that potential violations of these often take place outside our sphere of influence, often concerning migrant labour in the construction industry. We attempt to meet this challenge by working according to the following guidelines:

When COWI has the management responsibility for the construction phase of a project, we have the chance to influence labour rights conditions at the construction site and act if they are not aligned with national and international ratified legislation. If we are not in charge

of any supervision on the project, we do not necessarily have access to the building site and, as such, are not aware of the human rights or labour rights standards. The obligation to act described in the human rights section also applies here.

The COWI Whistleblower system is also available for reporting observations or suspicion of discrimination.

DIVERSITY IS MORE THAN A RIGHT

COWI is an international company with projects all over the world. We need a diverse work force to develop the best and best priced solutions. We believe that embracing diversity is one way of sustaining our position as a leader within our field. To that end, we want to ensure that our pipeline of diverse leadership talents is optimised.

KEY ACTIVITIES AND OUTCOMES

During 2014, we continued our activities to ensure that COWI employees have state-of-the-art skills and competencies, ensuring not only their performance on COWI projects, but also their marketability outside COWI.

We enhance skills and competencies through the COWI Project Management Academy and a broad range of educational and course offers on other subjects. As part of the project management academy, business ethics is taught and debated, ensuring awareness as well as knowledge of the whistleblower hotline.

PARTNERING FOR TRAINING OF DEAF PEOPLE IN INDIA

In India, a new CSR law requiring a mandatory spend of two per cent of net profits on CSR initiatives went into effect in 2014. To fulfil this obligation, COWI India Private Ltd. (CIL) has partnered with the Noida Deaf Society, a non-profit organisation bringing education and training to hearing impaired in India. As a deaf person in India, access to both education and work is quite limited. Through CIL, we are able to contribute relevant education and employment opportunities.

Our contribution supports the NDS school and directly supports the operation costs of training 120 youths. COWI's relationship with NDS began in 2013, when special photogrammetry training was carried out for five students from

NDS, of whom three are now employed by COWI's mapping company in India.

WOMEN IN MANAGEMENT

It is COWI's ambition that the composition of the management should reflect the diversity of our business and markets. In the light of this, COWI set the target in 2013 for minimum two out of six of COWI's board members to be women within a four-year period. Our aim is that any given management forum shall reflect the diversity of the underlying organisation. Also, equal opportunities shall be given to everyone, regardless of gender, age, race, religion, nationality, ethnic and social origin, disability, political and sexual orientation, as COWI views diversity as a competitive advantage that helps us achieve the best results.

In 2014, one out of the six board members elected at the annual general meeting was a woman. The share of women in management is 22 per cent* compared to 29 per cent of all employees being women. To increase the number of women in management, COWI is a party to Copenhagen's

Diversity Charter and participates in an external mentor network in cooperation with other major Danish companies.

EMPLOYEES IN THE COWI GROUP 2013-2014

	2013	2014
Employees	6,102	6,258
Average age, years	41.7	42.0
Women	30%	29%
Men	70%	71%
Women in management*	–	22%

* Based on data on 85 per cent of the employees.

POLICIES, PRINCIPLES AND TOOLS RELATING TO LABOUR RIGHTS

COWI's value on respect
COWI Whistleblower
Policy on sustainable development
Policy on diversity and inclusion
Policy on health and safety
FIDIC Code of Ethics, adopted by COWI

All policies are available at www.cowi.com/sustainability and www.cowi.com/policies

POLICY: DIVERSITY AND INCLUSION

COWI views diversity as a competitive advantage that helps us achieve the best results for our customers.

To meet our objectives, we will:

- › aim to have a diverse workforce that mirrors the diversity in our business and markets.
- › give equal opportunities to everyone, regardless of gender, age, race, religion, nationality, ethnic and social origin, disability, political and sexual orientation.
- › ensure that our employment and recruitment practices adhere to local legislation, wherever we work in the world.
- › continuously improve equal opportunities in our employment and recruitment practices.
- › work towards creating a culture of tolerance and appreciation of difference.

ENVIRONMENT

07

PRINCIPLE:

Businesses should support a precautionary approach to environmental challenges.

09

PRINCIPLE:

Businesses should encourage the development and diffusion of environmentally friendly technologies.

08

PRINCIPLE:

Businesses should undertake initiatives to promote greater environmental responsibility.

WORKING WITH CLIMATE CHANGE AND THE ENVIRONMENT

The area of environmental protection is where COWI has the greatest potential for impact through its activities.

We focus our business development on being a leading consultant developing future climate-change mitigation measures and adaptation solutions in sectors and regions where we have a strong foothold. In line with our climate-change strategy, we contribute actively to evaluating the potential for climate solutions and argue for the implementation of such, in partnership with our customers. We continue to upgrade and develop our skills in this area to be able to suggest new and more environmentally friendly solutions to our customers.

We will seek to reduce our own impacts through carbon-conscious policies and initiatives in respect of the efficiency needs of our customers and our organisation. The data to document our progress in this area is only available for

our Danish activities and are described as part of the green accounts on the following pages.

Finally, we promote the voluntary participation of employees in environmental initiatives and locally run campaigns to increase the awareness of resource-conscious behaviour.

KEY ACTIVITIES AND OUTCOMES

A large proportion of our projects carry some element of climate-conscious technologies. Below is a selection of such projects from 2014.

CLIMATE KIC NORDIC

COWI is the only Danish consulting company invited to be a partner in the Nordic branch of Climate KIC, the EU's largest public-private innovation partnership on climate change consisting of companies, academic institutions and the public sector, with the aim of transforming knowledge and ideas into economically viable products or services that help to mitigate and adapt to climate change.

In 2014, COWI participated in three projects under this partnership:

- › Overcoming barriers for climate-resilient building practices (with Rockwool, Velux and the Danish Technology University)
- › Unlocking market demands for micro energy production in water utilities (with Grundfos)
- › Kafka – a climate adjustment project for cities (with a range of European partners).

RETHINK BUSINESS

COWI's Region Denmark was involved in the EU-financed project "Rethink business", where 40 small and medium sized companies were offered assistance in developing and testing new business ideas supporting more efficient products and product components, inspired by cradle-to-cradle and circular economy concepts.

SNOW AND ICE REDUCE CO₂ CONSUMPTION

In developing the extension of Oslo

International Airport, Gardermoen, COWI and its project partners found a way to live up to the client's requirement to reduce energy consumption by 50 per cent compared with the existing passenger terminal from 1998.

Among other things, this is achieved through an innovative solution for cooling the passenger terminal during the summer season by using up to 44,000 m³ of winter snow collected and compressed in a snow store on the airport site. The store is insulated to keep the snow for the summer season and use it for cooling the airport buildings via a district cooling system.

SUSTAINABLE CITIES

As participant in the Chinese project "World alliances for low-carbon cities", the Chinese city of Shenzhen has committed to creating approximately 60 km² of cityscape based on circular economy principles. In 2014, Shenzhen asked COWI to review its urban development plan and optimise it in terms of

sustainability. This resulted in a number of suggestions related to using waste and surplus heating as a resource or to the re-usability of materials in new urban structures, while limiting resource consumption and using renewable energy.

TAKING OUR OWN MEDICINE

In 2014, we completed the refurbishment of our corporate head office in Lyngby with new common areas designed according to cradle-to-cradle principles, i.e. a closed-loop approach. Materials used for ceilings, floors, roof, windows etc. were all chosen based on their recyclability and the amount of recycled materials used to produce them. For example, 80 per cent of the steel used was recycled steel, and the insulation for ceilings was made from 100-per cent recycled materials.

POLICIES, PRINCIPLES AND TOOLS RELATED TO ENVIRONMENTAL PROTECTION

COWI's value on respect

COWI whistleblower

FiDiC Code of ethics, adopted by COWI

Policy on sustainable development

Policy on sustainable supply chain

All policies are available at www.cowi.com/sustainability and www.cowi.com/policies

GREEN ACCOUNTS

2014 GREEN ACCOUNTS

As part of our reporting on the Communication on Progress, COWI Denmark publishes our green accounts covering our environmental footprint. Data covers all activities in Denmark including corporate functions and the Danish part of our major business line, Bridge, Tunnels and Marine Structures. This year, our use of taxis is also included in the green accounts.

In 2014, we continued the positive trend of reducing our environmental footprint as shown in the graphs to the right. The numbers displayed are CO₂ equivalents, thus encompassing all greenhouse gases.

Since 2010, we have decreased our CO₂ emissions per employee by more than one third. The national lower emission factors for electricity and the renewal of the car pool contribute to this positive development.

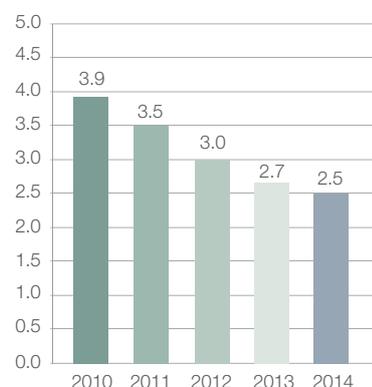
In 2014, we used less heat, electricity and water per employee. In addition, we converted about five per cent of our local travel from car to train. Moreover, our usage of paper declined, and we recycle our paper and change to environmentally certified paper, whenever possible. In 2014, the share of printing paper and paper products from certified sources reached 99 per cent. Finally, we increased the reuse of waste, leading to CO₂ savings of 102 tonnes in 2014 compared to 82 tonnes in 2010.

These results are due to our procurement principles and our permanent aim to reduce heat loss and the use of electricity and water in our office

facilities. Thus, our head office in Lyngby was renovated in 2014, for example introducing energy-saving lighting to an even higher degree than previously. Acquiring electric and hybrid cars is also an example of this mind-set. In 2014, we purchased two electric cars and two hybrid cars as part of the continuous updating of the car pool.

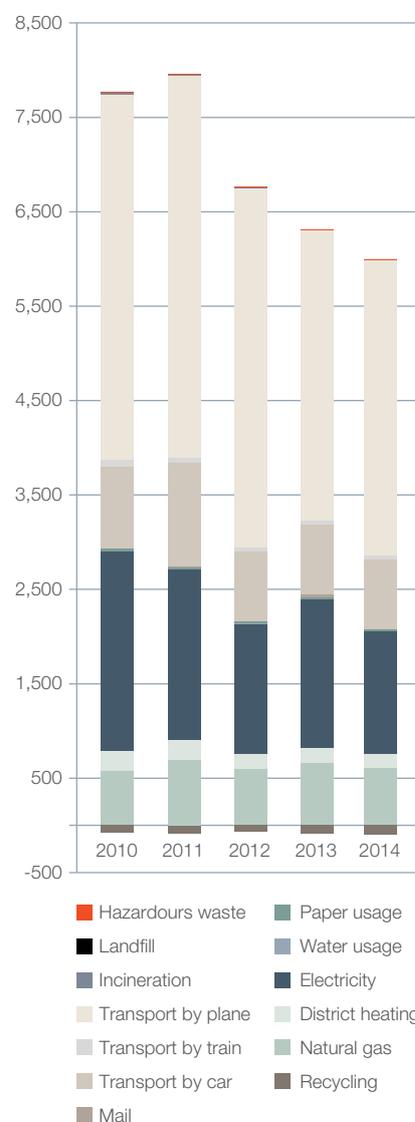
Air travel accounts for a large part of our climate impact: 53 per cent in 2014. The impact per employee in 2014 is 1.4 tonnes CO₂ compared to 1.8 tonnes in 2010. The decrease is mainly due to increasing awareness among employees about the impact of air travel, and the many possibilities of using video conferencing for small and large meetings across offices, internally and with customers.

CLIMATE IMPACT PER EMPLOYEE IN DENMARK, TONNES CO₂ EQ



■ 2010
■ 2011
■ 2012
■ 2013
■ 2014

CLIMATE IMPACT DISTRIBUTED ON CATEGORIES, TONNES CO₂ EQ



■ Hazardous waste
■ Landfill
■ Incineration
■ Transport by plane
■ Transport by train
■ Transport by car
■ Mail
■ Paper usage
■ Water usage
■ Electricity
■ District heating
■ Natural gas
■ Recycling



**GUIDELINE:
SUSTAINABLE SUPPLY CHAIN**

COWI procures goods and services at the best terms, assessing total costs, quality and sustainability.

To meet our objective, we will:

- › integrate sustainability requirements in our supplier and sub-consultant approval process.
- › give preference to water- and energy-efficient products to reduce consumption rates.
- › give preference to environmentally friendly products and products that can be recycled.
- › avoid products with hazardous substances.
- › consider the emissions of CO₂ when booking business trips.
- › consider if a business trip can be replaced by a videoconference or other information and communication technology.

< COWI takes part in the Nordic branch of the European Commission's initiative Climate-KIC. The initiative aims to translate research and knowledge into tangible, innovative solutions that can address global climate challenges – and at the same time be implemented commercially in the market. Among the partners are both public and private actors, and COWI represents the consulting industry, bringing to the table interdisciplinary knowledge on climate solutions from both a specialised engineering and a wider socioeconomic perspective.

ANTI-CORRUPTION

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

AGAINST ALL FORMS OF CORRUPTION

We believe that the ultimate winners will be companies that do not accept or engage in corruption. We have a business integrity policy to support this belief, which states:

"We will not in our services or in any other activity, directly or indirectly, accept bribery, extortion, fraud, collusion or any other undue business activity."

Each member of the COWI Group is required to implement business integrity management. This should be done in accordance with the FIDIC Code of Ethics, COWI's business integrity policies and guidelines, and with the laws applicable in the company's home country and the countries of operation.

In COWI, we believe that the adoption of good governance, transparency and accountability into day-to-day business is the best fence against corruption.

COWI's whistleblower system enables employees and external stakeholders to anonymously report any violations of our principles on business integrity and sustainable development. It is important that our employees have a common

understanding of our business integrity policy and are familiar with the COWI Whistleblower, which can help the business and prevent future offences and unethical behaviour.

KEY ACTIVITIES AND OUTCOMES

In 2014, COWI completed the development of a business-integrity compliance project, which will improve due diligence of business partners in relation to anti-corruption. In 2015, we will through e-learning improve the training of our employees across the Group in performing due diligence processes.

As part of our risk management system, COWI twice a year reviews an internal list of countries that our regions defined as high-risk areas in terms of concerns related to security or business climate. We apply enhanced risk management if, exceptionally, a project is carried out in one of those places. In 2014, 28 countries were on the list.

WHISTLEBLOWER USE

Four cases were reported into our whistleblower hotline in 2014. Of these, one was dismissed as out of scope, and the remaining three were investigated at corporate level or passed on to local management for follow-up.

POLICIES, PRINCIPLES AND TOOLS RELATING TO ANTI-CORRUPTION

[Business integrity policy](#)

[COWI's value on integrity](#)

[COWI Whistleblower](#)

[FIDIC Code of Ethics, adopted by COWI](#)

All policies are available at www.cowi.com/sustainability and www.cowi.com/policies

GUIDELINE: COWI WHISTLEBLOWER

COWI wishes to maintain a high standard of business ethics and encourages anyone to talk to their line manager about concerns regarding business ethics. If they feel uncomfortable doing so, they can use the COWI Whistleblower.

To meet our objectives, we will:

- › ensure that any concerns raised through the Whistleblower are investigated and appropriate action taken.
- › allow everyone including employees, former employees, sub-contractors, agency staff and business partners to use the Whistleblower.
- › allow whistleblower notifications within:
 - › violations of legislation, regulations and internal policies.
 - › misbehaviours with regard to accounting and auditing.
 - › fraud, theft and conflicts of interest.
 - › improper giving or receiving of gifts.
 - › discrimination and harassment.
 - › violation of environmental protection, health and safety legislation.
- › make the Whistleblower publicly available.
- › continuously train our employees in maintaining our culture of integrity and honesty and inform them of the Whistleblower.

POLICY: BUSINESS INTEGRITY

COWI wishes to maintain its impartiality and independence and contribute globally to a fair conduct of business, avoiding extraneous influence on selection, execution or compensation procedures. We will not in our services or in any other activities, directly or indirectly, accept bribery, extortion, fraud, collusion or any other undue business activity.

To meet our objectives, we will:

- › continuously train our employees in the area of business integrity.
- › continuously develop and maintain proper tools to help and guide our employees.

ABOUT GLOBAL COMPACT

Global Compact is an initiative launched in January 1999 by former UN Secretary-General Kofi Annan.

It is a call to businesses worldwide to help build social and environmental frameworks that ensure open and free markets and help people everywhere secure a chance to share the benefits of the new global economy.

The Global Compact encompasses ten principles spanning everything from international declarations on human rights and labour rights to environmental and corruption issues.



Current waste management practices in the majority of cities in India's most populated state, Uttar Pradesh, > are inefficient, incur heavy expenditure and pose a major threat to the public health and environmental quality. In 2014, the World Bank assigned COWI as technical consultant to introduce integrated solid waste management in 17 cities in Uttar Pradesh. The project is carried out by a multidisciplinary team delivering high-level expertise on waste planning, collection and transport system design, landfill engineering, waste-to-energy, composting, agriculture, and financial and social issues.





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