

COMMUNICATION
ON PROGRESS

2015

2015 UN GLOBAL COMPACT



COWI



< A new ground-breaking COWI report commissioned by the Danish Environmental Protection Agency shows that microplastics are everywhere. When we go for a run, paint our house or take a trip in the car we leave a trace of tiny particles in our wake – so-called microplastics which can be damaging to organisms and eco-systems. An unknown amount of these environmentally harmful plastic particles ends up in the sea having passed through wastewater treatment plants. The report provides an overview of the sources of pollution and a catalogue of ideas of areas which need further investigation.

04

COMMITMENT
FROM OUR CEO

06

SUSTAINABILITY
AND CSR IN COWI

08

HUMAN RIGHTS

10

LABOUR RIGHTS

12

ENVIRONMENT

14

GREEN ACCOUNTS

16

ANTI-CORRUPTION

18

ABOUT GLOBAL
COMPACT

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.

PUBLISHED BY
COWI Holding A/S
Parallevej 2
2800 Kongens Lyngby
Denmark
Tel 56 40 00 00
Fax 56 40 99 99
www.cowi.dk
www.cowi.com
www.cowiholding.com

COVER ILLUSTRATION
COWI is assisting the EU to meet its ambitious targets for 2020. By then 20% of the EU's energy consumption should stem from renewable sources. Meeting this target while at the same time ensuring a reliable energy supply and securing competitiveness poses a huge challenge. Together with partners all over Europe, COWI is helping the EU in its processes by carrying out numerous pre-studies to support the production and promotion of energy from renewable sources.

PHOTOS AND ILLUSTRATIONS
Jens Markus Lindhe
Andrik Mols
Nils Kristensen
Nicky Bonne
Scanpix
iStock

EDITORIAL INPUT ENDED
February 2016.

COMMITMENT FROM OUR CEO

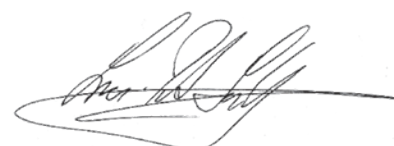
Each year, more than 6,000 highly competent COWI employees are involved in approximately 13,000 projects. They deliver engineering, economic and environmental services to customers around the world.

As we deliver these services, we are continuously aware that environmental and social responsibility has become a high priority field for our customers. With the establishment of the UN Sustainable Development Goals in September 2015 and the Paris Agreement on climate change reached in December 2015, it is our opinion this focus is likely to grow in the future. This provides market

opportunities for COWI. At the same time new legislation and emerging voluntary standards are entering into force which may limit market access for companies that do not offer sustainable products or operate in a responsible manner.

Sustainability is integrated into our business activities by using and developing methods and technologies that facilitate more efficient use of limited natural resources. Our work to ensure that we do not have an adverse impact on human rights continues, while a conscious focus on diversity in the workplace with opportunities for all increases the value of our employer brand.

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.



Lars-Peter Søbye, 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. As needs and expectations progress, we pursue new ways of dealing with the opportunities and dilemmas faced by society and the company.

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.

COWI's potential for reducing environmental impacts lies in our service delivery and in the solutions we develop with and for our customers. As such, this is where we direct most of our efforts. However, we also focus on the sustainable operation of our own facilities.

Our commitment to sustainability and corporate social responsibility is an extension of our fundamental values, and builds on our vision and mission. This commitment is also reflected in our memberships of the UN Global Compact and the UN Caring for Climate initiative, as well as our support to the International Federation of Consulting Engineers' (FIDIC) Code of Ethics.

COWI wants and needs to be among the most attractive employers for professionals looking for a career within the consulting industry. To this end, we promote diversity and cultivate an ethical culture, both critical in our efforts to attract talented candidates.

COHERENT SOLUTIONS TO MEET GLOBAL CHALLENGES

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

One set of challenges is related to high urbanisation rates across the world, with ensuing pressure on infrastructure, water and energy. Solutions to these challenges are being developed by COWI in a range of railway projects in Scandinavia as well as a large-scale urban development project in Mecca, Saudi Arabia.

Further challenges are climate change and environmental degradation, which constitute threats that need to be overcome by, for example, low-energy buildings, security measures against adverse weather and recovery of contaminated land.

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 impact on sustainability.

INTEGRATION INTO BUSINESS PROCESSES

To mitigate risk, we apply, as an integrated part of our quality system, a project screening tool in which we take into account health and safety, as well as security, environmental, social and community outcomes for projects in Denmark and 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 of our Denmark-based activities. It describes our activities within the environment, human rights and social responsibility.



AT THE END OF 2015,
COWI HAD POLICIES COVERING
THE FOLLOWING AREAS:

Sustainable development
Transparency and anti-corruption
Sustainable supply chain
COWI Whistleblower hotline
Business integrity
Diversity and inclusion
Health and safety (HSE)

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

< PRODEM is a municipal development programme which will improve climate change resilience and solid waste management in 26 municipalities in the northern part of Mozambique. COWI was contracted to manage the programme and the funds made available by four European governments (145 million DKK). COWI identified capacity development, citizen engagement and social accountability as key drivers of the change towards improved municipal management and governance. Local presence of more than 25 years and a highly competent team of 26 local experts gives COWI a solid platform for assisting the municipalities in improving their citizens' quality of life.

HUMAN RIGHTS

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

WORKING WITH HUMAN RIGHTS
We believe that the support of human rights is rooted in COWI's 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 carrying out projects, and to enhancing our employees' attention to and knowledge of social conditions.

This policy is integrated into our risk assessment and training systems. Through these 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, our 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 we do not have adverse impacts on human rights through projects in which we are involved, we operate according to three procedures: Due diligence, Supervision and Obligation to act, described on the following page.

All new employees are introduced to these three procedures as part of COWI's onboarding programme, and the procedures are included in our training, amongst other in COWI's award winning project management academy.

DUE DILIGENCE WHEN PREPARING PROPOSALS
As part of COWI A/S's quality management system, our project managers screen for risks of human rights violation before bidding for a project.

In our line of business we screen systematically for:

- › Physical conditions and indoor climate (temperature, air quality, noise, degassing etc.)
- › Ergonomics (work posture, heavy lifting)

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

- › Chemical and biological conditions (gases, particles, fibres, dust, liquids)
- › Risk 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).

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 each supplier in our system, which means that the entire organisation has access to all relevant supplier information.

In 2015, another 55 suppliers were assessed, approved and included in the system.

HEALTH AND SAFETY WORK
The work on health and safety in 2015 continued to focus 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 our operations. In 2015, 10 injuries with absence from work were reported.

While we have no data on the occurrence of absences due to work-related stress, we are aware that with a highly committed work force this is a risk of which we have to be aware. Further-more, we have designed and implemented a solid programme to prevent stress or bring people back to their jobs in cases of debilitating temporary stress.

In 2015, COWI conducted a global employee engagement survey which also related to the work environment in COWI. This shows an engaged workforce with pride in our achievements and reputation.

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 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 violations of human rights on a specific project, allowing us to exit 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 obliged 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 on-boarding programme.

POLICIES: HEALTH AND SAFETY
COWI strives for a healthy and safe 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.

04 PRINCIPLE:
Businesses should uphold the effective abolition of child labour.

05 PRINCIPLE:
Businesses should uphold the elimination of all forms of forced and compulsory 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 have working conditions in line with international labour rights.

We support and practise diversity and equal opportunities, our employees are free to organise themselves and bargain collectively as they wish, and they are all paid a fair wage. COWI dissociates itself from all kinds 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 of the construction phase of a project, we are able 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 the supervision of the project, we do not necessarily have access to the

building site and are therefore unaware of the human rights and/or labour rights standards practised. The obligation to act described in the human rights section also applies here.

The COWI Whistleblower system is 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 market leader in our fields.

COWI views diversity as a competitive advantage that helps us achieve the best results. It is our standpoint that equal opportunities should be given to everyone, regardless of gender, age, race, religion, nationality, ethnic and social origin, disability, political and sexual orientation.

To that end, we want to ensure that our pipeline of diverse leadership talents

is optimised. Our aim is that any given management forum shall reflect the diversity of the underlying organisation. In 2013, COWI set the target that by 2017 a minimum of two out of six of COWI's board members should be women.

In 2015, one 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 30 per cent of all employees being women.

In 2015, COWI started implementing standard COWI-wide talent management processes to improve focus on diversity. We have also piloted a People Review process in several business lines in order to strengthen our talent pool, development and diversity.

We continue to be engaged in a number of mentor programmes with universities. To increase the number of women in management and broaden the perspective on diversity, COWI will develop a revised diversity policy in the first half of 2016.



KEY ACTIVITIES AND OUTCOMES

During 2015, 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 training programmes and courses on other subjects. Business ethics are taught and debated as part of the project management academy, ensuring awareness as well as knowledge of the whistleblower system.

PARTNERING FOR TRAINING OF DEAF PEOPLE IN INDIA

Indian law requires a mandatory spend of two per cent of net profits on CSR initiatives. To fulfil this obligation, COWI India Private Ltd. (CIL) partners with the Noida Deaf Society (NDS), a non-profit organisation bringing education and training to hearing impaired in India. For deaf people 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

operational 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, one of whom is still employed by COWI's mapping company in India. A new training programme for four more students was completed in 2015, all of whom are now employed by COWI.

EMPLOYEES IN THE COWI GROUP 2014-2015

	2014	2015
Employees	6,258	6,364
Average age, years	42.0	41.5
Women	29%	30%
Men	71%	70%
Women in management*	22%	22%

* Based on data on 85 and 88 per cent of the employees, respectively.

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.

*Based on data on 88% of the employees

ENVIRONMENT

07 **PRINCIPLE:**
Businesses should support a precautionary approach to environmental challenges

08 **PRINCIPLE:**
Businesses should undertake initiatives to promote greater environmental responsibility.

09 **PRINCIPLE:**
Businesses should encourage the development and diffusion of environmentally friendly technologies.

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 adaption solutions in sectors and business lines 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 their implementation, in partnership with our customers. We continue to upgrade and develop our skills in this area to be able to propose 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 Denmark-based 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 2015.

CLIMATE KIC NORDIC
As the only Danish consulting company, COWI is a partner in the Nordic branch of Climate KIC. This is the EU's largest public-private innovation partnership on climate change. It consists of companies, academic institutions and the public sector, and aims to transform knowledge and ideas into economically viable products or services that help to mitigate and adapt to climate change.

In 2015, COWI finalised the three projects in which we were involved. New project opportunities are currently being investigated.

The three projects were:

- › Overcoming barriers for climate-resilient building practices (with Rockwool, Velux and the Technical University of Denmark), aiming to identify the barriers and challenges related to building near-zero energy buildings in Europe. COWI's role in the project was related to the performance and potential in single-family houses built according to the current standards and building practices. Results from the project can be used by construction businesses to determine potential improvements in their housing products, and for technology developers to identify markets for their products.
- › Unlocking market demands for micro energy production in water utilities (with Grundfos), i.e. investigating whether there is a market for micro hydro turbines for energy production in Denmark. The project concluded that at this point in time, the water utilities companies in Denmark do not represent such an opportunity and that it would be difficult to establish a commercially viable strategy.

› bKafka – a climate adjustment project for cities (with a range of European partners) in which methods for improving decision-making capabilities in cities were investigated to increase the quality of solution design for resilience projects which in turn can provide financial benefits and improved opportunities for attracting investments.

READY – SMART CITIES
COWI's business line Denmark was instrumental in securing EUR 20 million from the EU to fund the project "Ready – Smart Cities". COWI designed the project in collaboration with the City of Aarhus, Växjö Municipality in Sweden and the municipality of Kaunas in Lithuania. The project runs from 2014-2019. It studies a wide range of ideas such as heat recycling from wastewater and the use of recycled batteries for storing solar energy, in collaboration with research and industry partners.

NATURAL CAPITAL ACCOUNTING
In collaboration with Maersk Drilling and the Danish energy supply company DONG Energy, COWI's business line

Denmark is working to develop and demonstrate an alternative approach to Natural Capital Accounting, i.e., how to estimate, in monetary terms, environmental costs. The project focused on the construction of an oil and gas drill in the North Sea, and the Natural Capital Account included impacts on the environment in the full value chain following emission to air and water related to the production, transport, usage and final disposal of the materials steel, chemicals and fuels. The project provided valuable information on the division of environmental costs in tiers in the value chain, usable for both operational and strategic decision-making in the companies. The project was funded in part by the Danish Environmental Protection Agency.

The Ministry of Municipalities and Urban Planning in the State of Qatar awarded COWI a contract to study rainfall. Despite hot temperatures and bountiful sun, the desert country of Qatar sometimes experiences extreme rainfall. Doha, Qatar's capital, has undergone a major transition from a sleeping pearl

fishing port to one of the fastest growing capitals in the world. Sand has been converted into paved impermeable surfaces increasing the runoff during rain. Adequate drainage has been unable to follow the pace of the urban development causing traffic problems during heavy rainfall. Due to climate changes rainfall intensity of extreme rainfall is likely to increase further. The study will provide the state with a new standard constituting an improved basis for future drainage design.

POLICIES, PRINCIPLES AND TOOLS RELATED TO ENVIRONMENTAL PROTECTION

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



GREEN ACCOUNTS

2015 GREEN ACCOUNTS

As part of our reporting on the Communication on Progress, COWI Denmark publishes our carbon footprint for a given year and the trend for the past 5 years. Data covers all activities in Denmark, including corporate functions and the Danish part of our major business line, Bridge, Tunnels and Marine Structures.

In 2015, 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.

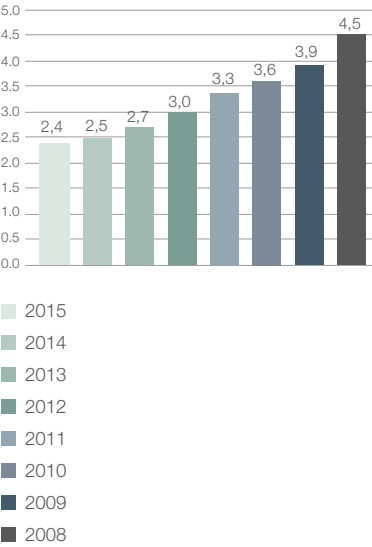
Since 2011, we have decreased our CO₂ emissions per employee by app. 30%. The decreasing emission factors for electricity in Denmark and the renewal of the car pool contribute to this positive development.

In 2015, we have used less heat and water per employee than the previous year. Emissions per employee from road transport have remained stable, even though the overall amount of road travel has increased. This is due to introduction of more hybrid and electrical vehicles in our fleet. Our paper usage has declined even further, and we now almost solely use environmentally certified paper. Finally the reuse of waste lead to CO₂ savings of 70 tonnes in 2015.

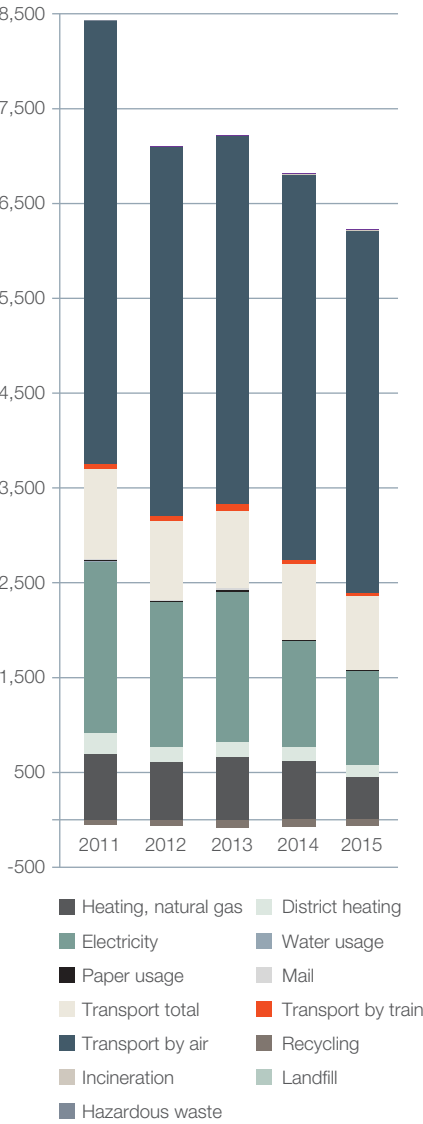
These results are due to our procurement principles and our permanent awareness of possibilities for energy savings.

Air travel, as always, accounts for a large part of our climate impact: 57 per cent in 2014. The impact per employee in 2015 is 1.4 tonnes CO₂ compared to 1.8 tonnes in 2011. In these figures, the impact of lower emissions per travelled kilometre due to better airplanes has not been taken into account. The decrease is therefore solely due to a higher awareness regarding responsible use of air travel.

CLIMATE IMPACT PER EMPLOYEE IN DENMARK, TONNES CO₂ EQ



CLIMATE IMPACT DISTRIBUTED ON CATEGORIES, TONNES CO₂ EQ



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 recyclable products.
 - › avoid products containing hazardous substances.
 - › consider the emissions of CO₂ when booking business trips.
 - › consider whether a business trip can be replaced by a video conference or other information and communication technology.

Green Solution House is a hotel with a positive footprint and a holistic approach to sustainable design. The hotel, built in the 1960s, underwent extensive renovation in 2015 with COWI as client consultant. Driven by a green agenda the renovated and extended building aims at demonstrating innovative and regenerative solutions in the built environment, including a healthy indoor climate, renewable energy sources, sustainable materials, circular economy and recyclability. A focal point was to integrate the surroundings with the building to create an inviting landscape based on sustainable parameters.

ANTI-CORRUPTION

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

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 must 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 prevention against corruption.

COWI's Whistleblower system enables employees and external stakeholders to report anonymously any violations of our principles on business integrity and sustainable development. It is important that our employees have a joint understanding of our business integrity policy and are familiar with the COWI Whistleblower system, which can help the business and prevent future offences and unethical behaviour.

KEY ACTIVITIES AND OUTCOMES

In 2015, COWI continued the development of a business integrity compliance project, which will improve due diligence of business partners in relation to anti-corruption. When completed, 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 reviews twice a year an internal list of countries that our business lines define

as high-risk areas in terms of concerns related to personal security or business climate. We apply enhanced risk management, if, exceptionally, a project is carried out in one of those places. In 2015, 27 countries were on the list.

WHISTLEBLOWER USE

Three cases were reported into our whistleblower hotline in 2015. These were all reported to the Board of Directors, 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 system.

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:
 - › violation of legislation, regulations and internal policies.
 - › misbehaviour 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 via www.cowi.com.
- › continuously train our employees to maintain our culture of integrity and honesty and inform them of the Whistleblower system.

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.

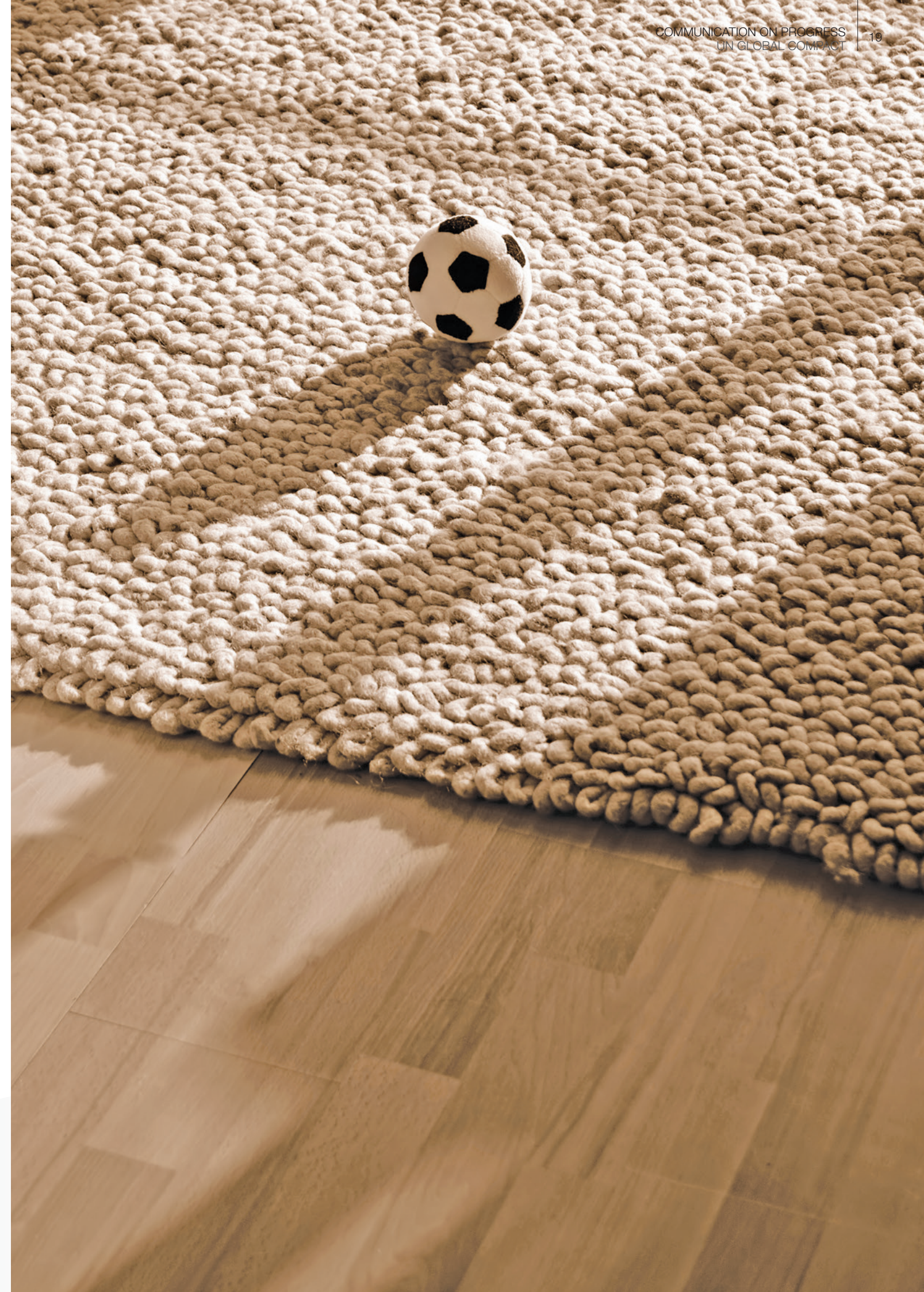
ABOUT GLOBAL COMPACT

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.

egecarpets a/s, a visionary Danish carpet producer with sustainability in their DNA, asked COWI to perform a Natural Capital Account (NCA). An NCA is an assessment of the societal costs related to the environmental impacts of a product. egecarpets a/s' NCA comprises: production and transportation of raw materials, production of the carpets on the premises of egecarpets, transportation to customers, use and final disposal of the carpets. Generally, NCAs are relevant in operational and strategic decision processes, as the monetary values allow comparison with e.g. investments and operational costs.





ADDRESS Parallelvej 2
2800 Kongens Lyngby
Denmark

PHONE +45 56 40 00 00

EMAIL cowi@cowi.com

WWW www.cowi.com