

# Code of Conduct

## Position Green

September 2023



# Position Green Code of Conduct

Position Green (PG) is committed to upholding the highest standard of integrity and ethics in all our work, across all areas of the Group and in all our geographies. The Code of Conduct applies to all Position Green employees, interns, partners, sub-contractors, and anyone acting on our behalf. It includes mandatory legal requirements and voluntary standards, which we seek to uphold.

***Our Mission is to revolutionise how businesses integrate sustainability.***

***Our Vision is to create a sustainable, fair and resilient future.***

## Ways of working

At Position Green, our "ways of working" embody our core values: *Entrepreneurial spirit, Uplifting attitude, Focused energy, and Professional integrity.*

- *Entrepreneurial Spirit:* We ignite innovation, foster creativity, and embrace proactive individuals who thrive on challenges and seize opportunities for growth and improvement.
- *Uplifting Attitude:* We cultivate a positive, supportive environment where teamwork, collaboration, and mutual respect flourish. Together, we inspire and uplift one another to reach our shared goals.
- *Focused Energy:* With a strong emphasis on focused energy, we channel our efforts and resources towards achieving impactful outcomes. We stay focused on our mission to revolutionise how businesses integrate sustainability.
- *Professional Integrity:* We value honesty and transparency in all our interactions. We maintain a strong commitment to delivering reliable and trustworthy services while adhering to legal and ethical guidelines.

We're committed to being open and transparent, consistently upholding these four values at the highest level. This dedication ensures exceptional quality in all our work and service delivery.

## Workplace and Environment

Position Green strives to create a safe, sustainable, healthy and inclusive workplace. We seek to have a positive environmental footprint.

- PG prohibits all discrimination against others based on gender, race, age, religion, disability, nationality, ethnic origin, sexual orientation or any other protected status.
- PG follows relevant national employment legislation and international labour standards expressed in the Core Conventions of the International Labour Organisation. Where these differ, the higher standard shall apply.

- PG promotes equal opportunity employment with the aim to ensure non-discrimination and fairness in recruitment and promotions.
- Harassment and bullying, including any unwelcome verbal or physical behaviour that interferes with work or creates an intimidating, hostile, or offensive work environment, is considered unacceptable. This includes but is not limited to any form of sexual harassment, sexual exploitation or sexual abuse.
- PG seeks to establish environmental consciousness, working to protect the environment in our internal business operations and in the delivery of our services. The PG Sustainability Policy outlines our fundamental principles and guides other policies advancing our environmental and social sustainability.
- PG is highly committed to protecting and respecting the fundamental human rights of anyone affected by our operations. The Company expects its employees, business partners and other parties directly linked to its operations, products or services to be equally committed to respecting internationally recognised human rights. These commitments are outlined in PG's Human Rights Policy.

## Responsibility and Respect

Employees at Position Green should take responsibility for their work and actions, emphasise teamwork and keep our ways of working in mind. Furthermore, employees should actively work to create a culture of respect and collaboration.

- Employees shall only accept assignments that are consistent with their background, experience, skills, and qualifications.
- PG does not allow any kind of plagiarism and is committed to upholding the highest standard of academic integrity.
- In the event of errors or omissions, PG shall take full responsibility for such mistakes and make corrections promptly.
- Employees should seek to be informed about other cultures and customs and avoid engaging in behaviours others might consider disrespectful.
- PG is committed to and works to ensure that its business activity is environmentally responsible and energy efficient, and that the environmental impacts are reduced wherever possible. PG is continuously focusing on sustainable improvements.
- All PG staff working on assignments are held to the highest standards of professional integrity. Bribery/corruption, discrimination in any form, and harassment of any form, including sexual harassment, are not tolerated and are considered unacceptable.

## Protection of company properties

PG is dedicated to the preservation and protection of its real estate, assets and property, including intellectual property. These resources shall be used exclusively for legitimate business purposes. PG recognizes the significance of confidential information pertaining to our company itself, its employees and its business partners. Such information shall be safeguarded against unauthorised access or disclosure. All employees shall be aware of the critical need to uphold the security and confidentiality of our assets.

## Bribery and Corruption

- Involvement in any form of corruption or bribery, whether directly or through intermediaries, is unacceptable and prohibited by law. This prohibition includes the facilitation of payments.
- Involvement in corruption or bribery will give cause to terminate the relationship with partners, sub-contractors and anyone acting on behalf of PG.
- The receipt of gifts, hospitality or expenses that are intended to affect the outcome of specific business transactions is considered a violation of this Code. Gifts, hospitality and expenses shall be modest and in line with acceptable legal and cultural practices.

## Conflict of Interest

- PG prohibits financial or other involvement that directly or indirectly could give rise to questions of our integrity and impartiality.
- PG shall proactively and fully disclose any actual or potential conflicts of interest to the concerned stakeholders, and, in cases where such conflicts of interest occur, will immediately take appropriate corrective action.

## Transparency and Confidentiality

PG demonstrates transparency in decision-making processes throughout the organisation and in our business relationships.

- PG shall seek to provide equal access to information to all those who are authorised to have the said information.
- Without prejudice to the above, PG shall, in accordance with all applicable legal requirements for data protection, protect any proprietary or confidential information that has been entrusted to us.
- PG will not disclose confidential client information without the specific consent of the client.

## Employee Right of Refusal

All Position Green employees maintain the right to abstain from working on any projects or in any locations that they deem to be unsafe or otherwise against their personal moral, ethical or religious code of beliefs. Such refusal shall be accepted by all levels of management without any form of repercussion.

## Complaints – Grievance Mechanism

Position Green seeks to stimulate open discussions about responsible conduct and invites all stakeholders to express their views and concerns.

- PG shall be open to other points of view and will directly approach those with whom we have a conflict or disagreement.
- PG maintains a [whistleblowing channel](#) hosted by EQS Integrity Line that is both confidential and anonymous. Information reported to the whistleblowing channel is reported to and reviewed by the Position Green Ethics Committee. Any suspicion of illegal actions is reported to relevant authorities. This channel is open both to employees and external stakeholders. All stakeholders are actively encouraged to report any concerns regarding unethical or illegal behaviour. Position Green is committed to non-retaliation towards any individuals who may utilise the whistleblowing channel and commits to transparency and cooperation with ethics investigations.

## Further information and consequences of breach

Any breach of this Code of Conduct may harm PG's business and in response, PG may take actions that could have adverse consequences for the employee's job or business partner's relationship with PG. With respect to employees, breaches could result in verbal or written admonition, dismissal and/or reporting to government authorities in severe cases.

Any questions you may have regarding this Code of Conduct may be raised with your immediate superior, People & Culture or the CEO of the Company.

The Code of Conduct shall be available on the Company's external website, and the Company's intranet and otherwise be communicated to all employees (including hired personnel), directors, representatives, agents, and others who act on the Company's behalf, and where relevant to business partners and other parties as appropriate.

Thank you for maintaining a respectful and inclusive workplace environment and for your commitment and cooperation.

PG People & Culture is responsible for the annual reading and revision of this Code of Conduct. This Code was adopted in September 2023 by the Individual/PG Board of Directors .



#### Norway

Oslo

#### Sweden

Stockholm  
Gothenburg  
Malmö

#### Denmark

Copenhagen

#### United Kingdom

London

#### United States

New York  
Houston