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CSR policy



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1. Focus on Environment, People, Society and Good Governance

Femern A/S' CSR Policy reflects the company's focus on accountability, transparency and respect.

The UN Global Compact, together with Femern A/S' own values and principles, serve the purpose of seeking to prevent and always mitigating the negative social, environmental and economic consequences of the company's activities.

Femern A/S has chosen to work with the following focus areas:

- Management and Governance
- Environment, Nature Conservation and Climate
- Safety, Health & Well-being
- Communication & Dialogue

Femern A/S expects its business partners, contractors, consultants and suppliers to take part in a constructive dialogue and cooperate in order to continuously improve employees' conditions, contribute to a sustainable process and participate in developing new standards for the benefit of the industry and posterity.

Femern A/S will work to maximise the positive benefits of the project to society, partly by implementing an ambitious CSR policy and by using management systems that ensure that all business partners, contractors, consultants and suppliers are familiar with Femern A/S' policies.

2. Management and Governance

Femern A/S' identity is founded on professional integrity, respect for the individual and constant focus on improving the planning, design, construction and operation of the fixed link. This is achieved through economic, social and environmental responsibility, due care and risk management as well as through modern management systems and management tools.

In its daily work, Femern A/S operates on the basis of these values:

- Professionalism
- Creativity
- Teamwork
- Commitment
- Trustworthiness

This means that Femern A/S:

- acts with trustworthiness and integrity towards employees and contractors and, in daily actions, demonstrates Femern A/S' values and policies
- supports and respects the protection of internationally proclaimed human rights, and seeks to ensure that the company is not complicit in violations of these rights
- disassociates itself from all forms of corruption, including fraud, bribery and extortion, and through its business practices contributes to the prevention of any kind of such activities
- does not tolerate discrimination or harassment of employees due to age, disability, ethnic origin, sex, race, political conviction, religion or sexual orientation
- communicates transparently, openly, honestly and promptly
- considers diversity to be an asset and acknowledges that professionalism can be expressed in many ways
- will make clear that the company wishes to cooperate with contractors, who also show responsibility and integrity
- demands that all work on Danish and German territory is carried out according to the respective Danish and German legislation
- demands that contractors comply with the UN Global Compact
- will establish the necessary tools, including quality and environmental management systems, to ensure that international conventions and the regulatory terms and conditions laid down in both the legislation and permits to carry out the project, are complied with
- will establish the necessary tools for monitoring and auditing the execution of the work and the contractors as appropriate
- will establish a transparent and easily accessible grievance mechanism with whistle blower protection.

Femern A/S will demonstrate responsible and committed management throughout the entire project. The company intends to cooperate only with contractors, who also have responsibility and integrity as fundamental principles in their business activities.

3. Environment, nature conservation and climate

Femern A/S' position on climate and environmental responsibility is based on the company's fundamental objectives to establish a fixed link, which contributes to the sustainable social and economic development in Scandinavia and Northern Europe.

Femern A/S will:

- seek to prevent or at least reduce climate and environmental impact by integrating environmental considerations into the planning, design, construction and operation of the fixed link
- ensure through systematic environmental management that the environmental protection requirements in the German and Danish authorities' permits and approvals are complied with
- implement climate and environmentally friendly measures and technologies to the extent that they are technically possible and economically reasonable
- work actively for the protection of nature and strive to ensure that no environmental damage is caused to lakes, watercourses and groundwater. Femern A/S is carrying out comprehensive environmental investigations and monitoring programmes in order to ensure that all relevant nature and environmental conditions are taken into account in the planning, design, construction and operation of the fixed link; and that any negative impact is avoided or at least reduced as much as possible
- strive to preserve landscape values by integrating the tunnel into the existing landscape on Lolland and Fehmarn
- adopt a precautionary approach and seek to prevent and reduce adverse climate and environmental impact as a consequence of planning, design, constructing and operating the fixed link by including environmental responsibility in all activities related to construction and buildings, transport, supply, purchasing, conduct and operations
- take part in an open dialogue with the public and stakeholders regarding the project's climate and environmental impact
- require that contractors engage in a continuous dialogue with Femern A/S on relevant environmental issues.

4. Health, Safety & Well-being

Femern A/S wishes to create the best framework for the health and safety of employees participating in the planning, design, construction and operation of the fixed link in order to avoid accidents and negative effects on health.

Femern A/S:

- will use Best Practice procedures and standards during the planning, construction and operation of the fixed link, including compliance with all directives and regulations regarding health, safety and well-being in Denmark and Germany
- will implement management systems in order to record and follow-up the work on health, safety and well-being. The company will also have the necessary management

tools to aid the swift identification and correction of negative trends; and to facilitate the dissemination of positive trends throughout the organisation

- intends to secure good pay and working conditions and that international conventions as well as the national legislation of the country in which the work is carried out, are observed, including regulations with regard to maximum working hours, holiday entitlement, working environment, freedom of association, collective bargaining and non-discrimination
- will not accept any form of forced labour or child labour
- intends to secure decent living conditions for those employees, who have to stay away from their homes and personal networks during the construction period. The company will strive to create conditions for the decent physical, mental and social well-being for seconded employees in line with the other employees
- intends to include the well-being of employees as an important factor in working with health and safety.

5. Communication & dialogue

Femern A/S will exercise social responsibility in close cooperation with its business partners, consultants, contractors and suppliers and will require that ethics, responsibility and values are demonstrated in daily operations.

Femern A/S:

- will provide the best possible information about the project and its consequences through continuous reporting and by timely and transparent communication
- will not accept social dumping in connection with the establishment of the fixed link
- recognises its social responsibility for the education/training of young people, and therefore intends to require apprenticeships and other types of education in contracts with contractors
- is actively engaged in the preparatory work of the regional business community
- will invite stakeholders to an open-minded dialogue and have a follow-up approach, which is based on principles of accuracy, timeliness, mutual respect, proactivity, openness and transparency
- recognises that the establishment of the fixed link is a bi-national project between Denmark and Germany and that the company has a special responsibility to show regard for both countries' culture, history and traditions
- recognises stakeholders' concerns, which come to the company's knowledge during the dialogue, and is committed, wherever possible, to acting upon them
- will keep the local communities and those who will be affected by the construction works, informed and listen to their concerns.