

CSR statement from Kromann Reumert

This document has been prepared in accordance with the CSR compass. In this document Kromann Reumert states that it complies with a number of CSR requirements within the following areas:

- Waste and recycling
- Working conditions, including accidents
- Fire safety
- Freedom of association
- Non-discrimination
- Corruption
- Medical assistance and first aid
- Salary and working conditions
- Environment and climate
- Psychological working environment
- Building safety
- Toilet and bathroom facilities
- Employee training
- Employees' pro bono work opportunities

1. Waste and recycling

Kromann Reumert ensures that:

- Waste, including reusable waste, has been sorted according to the rules of the Danish environmental authorities, and is utilized or disposed at approved waste plants.
- Hazardous waste has been labelled, stored and handled at environmentally approved waste plants in accordance with the guidelines of the relevant authorities.

Kromann Reumert is familiar with and respects the sorting and handling requirements, including recycling requirements, of waste set forth in the Danish Environmental Protection Act (Consolidated Act no. 1757 of 22 December 2006) and related law.

Danish legislation conforms to Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on waste, Council Directive of 12 December 1991 on hazardous waste (91/689/EEC), Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste, the supervision and control of shipments of waste within, into and out of the European Community, and the Basel Convention on the control of transboundary movements of hazardous waste.

Kromann Reumert's handling of waste is monitored by the local environmental authorities. If Kromann Reumert contravenes the Danish rules on waste, including reusable waste, the persons found liable may be fined or, in aggravating circumstances, punished by imprisonment of up to two years.

2. Working conditions, including accidents

Kromann Reumert ensures that:

All aspects of its work are planned and organised so that they comply with health and safety standards.

Kromann Reumert applies the following prevention principles in structuring its work.

- Risks are controlled at the source.
- To the extent possible, work is adapted to the individual employee's needs regarding design of the workplace, choice of work equipment, and working and production methods.
- Monotonous work repetitively strenuous work is limited as to minimise the negative health consequences from such work.
- No methods of construction or other work that may be a significant danger to employees are used.

Kromann Reumert prepares written assessments of workplace health and safety conditions on an ongoing basis. The assessments cover all working environment issues, and Kromann Reumert's employees are involved in the process.

Kromann Reumert is familiar with and respects the rules on health and safety in the workplace as set forth in the Danish Working Environment Act (Consolidated Act no. 268 of 18 March 2005), Executive Order on the Performance of Work no. 559 of 1 June 2004, and Executive Order on Young Persons' work no. 239 of 6 April 2005.

Danish legislation conforms to Council Directive of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work (89/391/EEC), Council Directive of 30 November 1989 concerning the minimum safety and health requirements for the workplace (89/654/EEC), Council Directive 94/33/EC of 22 June 1994 on the protection of young people at work, ILO Convention no. 155 of 22 June 1981 on occupational safety and health, ILO Convention no. 182 of 17 June 1999 on the worst forms of child labour, and ILO Convention no. 138 of 26 June 1973 concerning the minimum age for admission to employment.

Kromann Reumert's compliance with the Danish working environment rules is monitored by the Danish authorities. Employees who believe that their rights have been infringed have access to the courts. If Kromann Reumert contravenes the working environment rules, the persons held liable may be punished by fines or imprisonment.

3. Fire safety

Kromann Reumert ensures that:

Kromann Reumert has taken the necessary measures and made the required plans for fire fighting and evacuation of employees.

Kromann Reumert has appointed and trained the people who will be responsible for carrying out the measures and plans.

Kromann Reumert's employees have been informed of the fire fighting and evacuation plans.

At the workplace, there are adequate opportunities for escape and the rescuing of people. This means that:

- There are sufficient escape routes and fire exits.
- Fire exit doors and gates can be opened in easily and safely and are not obstructed.
- Escape routes are not obstructed.
- There are signposts providing information or warning about matters of importance to safety and health.
- The workplace is equipped with alarm systems and required first aid equipment that can deal with special dangerous situations and accidents.
- Fire extinguishers in adequate numbers have been installed.
- Combustible waste is kept in fire-proof containers that are emptied on a regular basis.

Kromann Reumert is familiar with and respects the rules on fire safety as set forth in the Danish Building Act (Consolidated Act no. 452 of 24 June 1998), and in the Danish Working Environment Act (Consolidated Act no. 268 of 18 March 2005).

The Danish working environment legislation conforms to Council Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work, Council Directive 89/654/EEC of 30 November 1989 concerning the minimum safety and health requirements for the workplace, Council Directive 92/58/EEC on the minimum requirements for the provision of safety and/or health signs at work, and ILO Convention no. 155 on occupational safety and health.

Kromann Reumert's compliance with the Danish working environment rules is monitored by the Danish authorities. Employees who believe that their rights have been infringed have access to the courts. If Kromann Reumert contravenes the working environment rules, the persons held liable may be punished by fines or imprisonment.

4. Freedom of association

Kromann Reumert ensures that:

- Kromann Reumert does not attach importance to or otherwise make decisions which are influenced by the employee's union affiliation or memberships of other associations.
- Kromann Reumert does not seek to influence whether its employees are members of any specific trade union.
- Trade union representatives are granted special protection when they perform tasks in such capacity.
- Kromann Reumert does not interfere with which trade unions or other associations are formed at the workplace.
- Employees are not dismissed due to their union affiliation.
- No trade unions are given preferential treatment.
- The right to collective bargaining is respected.
- Appointed trade union representatives for the employees are given special protection against dismissal.

Kromann Reumert is familiar with and respects the employees' rights to organise and enter into collective bargaining, i.e. as set forth in the Danish Act on Freedom of Association on the Labour Market (see Consolidated Act no. 424 of 8 May 2006), and in the general agreements between the labour market parties, i.a. see the general agreement between LO (The Danish Confederation of Trade Unions) and DA (the Danish Employers' Confederation) from 1973.

Danish legislation and the general agreement between the labour market parties conform to the European Human Rights Convention of 4 November 1950, the United Nations Covenant on Civil and Political Rights of 16 December 1966, the United Nations Covenant on Economic, Social and Cultural Rights of 16 December 1966, ILO Convention no. 87 of 9 July 1948 on Freedom of Association and Protection of the Right to Organise, ILO Convention no. 98 of 1 July 1949 on the Right to Organise and Collective Bargaining, and ILO Convention no. 135 of 23 June 1971 on Protection and Facilities to be afforded to Workers' Representatives in the Undertaking. Employees who believe that their rights have been have access to the courts. If Kromann Reumert breaches the rules, they may be ordered to pay compensation to the employee.

5. Non-discrimination

Kromann Reumert ensures that:

- There is no discrimination based on gender, race, colour, religion or faith, political opinion, sexual orientation, national origin, social origin, ethnic origin, age or disability within Kromann Reumert.
- There is no discrimination in connection with hiring, dismissal, secondment, promotion, fixing of salaries, determination of working conditions, or training within Kromann Reumert. All decisions regarding hiring, promotion, dismissal, salary, and other working conditions are based on relevant and objective criteria.

Kromann Reumert is familiar with and respects the ban on discrimination set forth in the Danish Act against Discrimination on the Labour Market, etc. (Consolidated Act no. 1349 of 16 December 2008) and the Danish Act on Equal Treatment of Men and Women in the Access to Employment and Maternity/Paternity Leave etc. (Consolidated Act no. 734 of 28 June 2006).

Danish legislation in the area of discrimination conforms to Council Directive 2000/43/EC of 29 June 2000 on equal treatment between persons irrespective of racial or ethnic origin, Council Directive 2000/78/EC of 27 November 2000 on a general framework for equal treatment in employment and occupation, Council Directive 2004/113/EC on equal treatment between men and women in the access to and supply of goods and services, Council Directive 2006/54/EC of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation, the European Human Rights Convention of 4 November 1950, the United Nations Convention on the Elimination of All Forms of Racial Discrimination of 21 December 1965, the United Nations Convention on All Forms of Discrimination against Women of 18 December 1979, ILO Convention no. 100 of 29 June 1951 on equal remuneration, and ILO Convention no. 111 of 25 June 1958 on discrimination, ILO Convention no. 169 of 27 June 1989 on indigenous and tribal peoples.

Kromann Reumert's compliance with the Danish legislation is monitored by the Danish authorities. Employees who believe that their rights have been infringed have access to the courts. Employees who believe that they are subject to discrimination may also have their complaint heard by the Board of Equal Treatment. If Kromann Reumert contravenes the rules, the persons held liable may be punished by fine or imprisonment, and the employee may be awarded compensation.

6. Corruption

Kromann Reumert ensures that:

None of Kromann Reumert's employees gives or receives unjustified benefits from Danish or foreign public servants or employees in the private sector.

Kromann Reumert is familiar with and respects the rules on corruption as set forth in the Danish Penal Code (Consolidated Act no. 1068 of 6 November 2008), [sections 122, 144, 290, 299(2) and 306]. [SOURCE LANGUAGE NOT CLEAR]

Danish legislation conforms to the European Council's convention on combating corruption in the private sector and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

Violations of the Danish rules on corruption are punishable by the Danish authorities by fine or imprisonment. This may also apply if the criminal conduct has been committed abroad.

7. Medical assistance and first aid

Kromann Reumert ensures that:

All Kromann Reumert's employees have access to free medical assistance. There is no requirement in Denmark that employees be insured in order to obtain medical assistance. Kromann Reumert has also implemented the required measures concerning first aid. This means that:

- The workplace is equipped with appropriate life-saving equipment and other instruments required for first aid in the event of accidents.
- A sufficient number of persons have been trained in first aid.

Kromann Reumert is familiar with and respects the rules on access to first aid as set forth in the Danish Working Environment Act (Consolidated Act no. 268 of 18 March 2005).

Danish legislation conforms to Council Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work, Council Directive 89/654/EEC concerning the minimum safety and health requirements for the workplace, and ILO Convention no. 155 on occupational safety and health.

Kromann Reumert's compliance with the Danish working environment rules is monitored by the Danish authorities. Employees who believe that their rights have been infringed have access to the courts. If Kromann Reumert contravenes the working environment rules, the persons held liable may be punished by fines or imprisonment.

8. Salary and working conditions

Kromann Reumert ensures that:

- All employees have a minimum salary that complies with international standards.
- No later than one month after the commencement of the employment, all employees receive written information about salary, place of work, duties, rights to paid holidays, notice periods, salary conditions, working hours, and any collective agreements.
- All Kromann Reumert employees have at least 25 days of paid holiday per year.
- All employees who work for a shorter period, accrue holiday time adjusted to the length of their employment.

Kromann Reumert is familiar with and respects the Danish requirements on salary conditions, benefits and terms of employment as set forth in the Danish Act on Statements of Employment Particulars (Consolidated Act no. 1011 of 15 August 2007), the Danish Holiday Act (Consolidated Act no. 407 of 28 May 2004), the Danish Act on Equal Treatment of Men and Women in the Access to Employment and Maternity/Paternity Leave (Consolidated Act no. 734 of 28 June 2006), the Danish Act on Maternity/Paternity Leave and Pay (Act no. 566 of 9 June 2006).

Danish legislation conforms to Council Directive 91/533/EC of 14 October 1991 on an employer's obligation to inform employees of the conditions applicable to the contract or employment relationship, the United Nations Covenant on Economic, Social and Cultural Rights of 16 December 1966, the United Nations Convention on All Forms of Discrimination against Women of 18 December 1979, and ILO Convention no. 52 on holidays with pay.

Employees who believe that their rights have been infringed have access to the courts. If Kromann Reumert contravenes the rules, they may be ordered to pay compensation to the employee and to pay the amount of salary not paid.

9. Environment and climate

Kromann Reumert:

- works to reduce our carbon dioxide emissions so that we will reach our target of a 20% reduction from 2008 to 2012
- sorts all waste with a view to disposing of waste in the best manner
- prefers suppliers whose products entail minimum waste of resources and pollution.

Kromann Reumert works determinedly and systematically to improve its environmental performance on an ongoing basis.

10. Psychological working environment

Kromann Reumert ensures that:

- The work entails minimal physical or psychological health deterioration.
- An assessment has been made of all physical, ergonomic and psycho-social factors matters in the working environment, that could influence physical or psychological health in the short or long term. The assessment has been made for all elements of the work and contributes to ensuring that the work is performed in compliance with health and safety standards.
- Monotonously straining work that entails a risk to physical or psychological health in the short or long term is avoided or limited.
- The work rate is such that it does not pose any risk to physical or psychological health in the short or long term.
- Isolated work which may pose a risk to physical or psychological health is avoided or limited.
- The work does not pose a risk to physical or psychological health from bullying, including sexual harassment.

Kromann Reumert is familiar with and respects the rules on mental working environment as set forth in the Danish legislation in the Danish Working Environment Act (Consolidated Act no. 268 of 18 March 2005).

Danish legislation conforms to Council Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work.

Kromann Reumert's compliance with the Danish working environment rules is monitored by the Danish authorities. Employees who believe that their rights have been infringed have access to the courts. If Kromann Reumert contravenes the working environment rules, the persons held liable may be punished by fines or imprisonment.

11. Building safety

Kromann Reumert ensures that:

All buildings, installations, areas, etc. to which Kromann Reumert's employees have access in connection with their work have been designed, constructed and used in such a way that they do not pose a risk to the health and safety of the employees.

This means that:

- The workplace has been organised in accordance with health and safety standards on the basis of an assessment of the working environment aspects that may influence physical or psychological health.
- The place of work has been designed so that there are opportunities for escape and the rescue of people in the event of fire or other accidents.

Kromann Reumert is familiar with and respects the rules on safe buildings as set forth in the Danish Building Act (Consolidated Act no. 452 of 24 June 1998), and in the Danish Working Environment Act (Consolidated Act no. 268 of 18 March 2005).

The Danish working environment legislation conforms to Council Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work, Council Directive 89/654/EEC of 30 November concerning the minimum safety and health requirements for the workplace, and ILO Convention no. 155 of 22 June 1981 on occupational safety and health.

Kromann Reumert's compliance with the Danish working environment rules is monitored by the Danish authorities. Employees who believe that their rights have been infringed have access to the courts. If Kromann Reumert contravenes the working environment rules, the persons held liable may be punished by fines or imprisonment.

12. Toilet and bathroom facilities

Kromann Reumert ensures that:

Kromann Reumert's employees have access to good sanitary facilities. This means that:

- All employees have access to flushing toilets, wash basins with hot and cold running water, and soap or skin cleaning agents.
- Employees have access to bathrooms, if the work is dirty, physically strenuous, or entails the danger of getting in touch with hazardous substances or materials.
- Wash basins are located conveniently in relation to working spaces, canteen, toilets, wardrobes, or changing rooms.

Kromann Reumert is familiar with and respects the rules on sanitary facilities in the workplace as set forth in the Danish Working Environment Act (Consolidated Act no. 268 of 18 March 2005).

The Danish legislation conforms to Council Directive 89/654/EEC of 30 November 1989 concerning the minimum safety and health requirements for the workplace.

Kromann Reumert's compliance with the Danish working environment rules is monitored by the Danish authorities. Employees who believe that their rights have been infringed have access to the courts. If Kromann Reumert contravenes the working environment rules, the persons held liable may be punished by fines or imprisonment.

13. Employee training

Kromann Reumert is familiar with and respects the rules on training of employees in health and safety as set forth in the Danish Working Environment Act (Consolidated Act no. 268 of 18 March 2005, as amended).

The Danish legislation conforms to Council Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work, Council Directive 94/33/EC of 22 June 1994 on the protection of young people at work, ILO Convention no. 155 of 22 June 1981 on occupational safety and health, ILO Convention no. 138 of 26 June 1973 concerning the minimum age for admission to employment, and ILO Convention no. 182 of 17 June 1999 on the worst forms of child labour.

Kromann Reumert's compliance with the Danish working environment rules is monitored by the Danish authorities. Employees who believe that their rights have been infringed have access to the courts. If Kromann Reumert contravenes the working environment rules, the persons held liable may be punished by

finer or imprisonment.

14. The employees' pro bono work opportunities

The employees have expressed the wish that Kromann Reumert performs pro bono work in order to make a difference in society. Kromann Reumert's pro bono work includes work which is performed by the firm's employees free of charge or at very reduced prices, without the work being mainly performed in Kromann Reumert's own interest.

It is Kromann Reumert's basic principle that the same case handling rules apply to pro bono work as to all other types of work; however, in connection with pro bono work there will be a stricter assessment that the acceptance of an engagement will not entail conflicts of interest or other adverse effect to Kromann Reumert.