

COLLEN CONSTRUCTION

SUSTAINABILITY REPORT

REPORTING PERIOD

April 2024 – March 2025



THE SLIGO WAY



Introduction

This Sustainability report for the financial period commencing 01/04/2024 to 30/03/2025 is published by Collen AB. This report is prepared, considering local Swedish sustainability metrics and criteria, according to the requirements stated within the Swedish Annual Accounts Act. Global practices and reporting standards which were leveraged for the benefit of the Swedish program, were considered. Based on the requirements within the Swedish Annual Accounts Act, the following subsidiaries are in scope of the statutory requirements:

- Collen AB (org.no. 559116-1061)

We have endeavored to include all necessary and meaningful information applicable to Collen Sweden on a stand-alone basis. Where such information is not available on a stand-alone basis, we have provided information pertaining to the Collen Group.

Sustainable Business Model

As a global main contractor, we recognise the role we can play in creating a more sustainable and prosperous future for all. Collen is an 8th generation, family-owned business founded in 1810 with a strong reputation for Sustainability has always been a core value for Collen, from sustaining the company for the 8th generation Collen family, to sustaining the environment for all future generations.

Collen's portfolio includes commercial, fit-out, data centres, substations, biopharma, industrial warehousing, retail, residential, healthcare, conservation, and education projects, ranging in value from under €1 million up to €750 million. The company specialises in the delivery of data centres and is recognised as a leader within the data centre build environment with projects in Ireland, Germany, and Sweden.

Collen's dedicated teams work closely with design teams providing a full turn-key service through procurement, installation, and commissioning of all elements of the project including fit-out in order to provide a fully functional project to the client's needs and standards, upon completion. The management team ensures smooth co-ordination of all aspects of the project including mechanical and electrical services.

Collen promotes positive social responsibility and good community relationships in the areas it operates through the generation of local employment, which contributes to inclusive growth, and consideration for inhabitants in close occupation of its operations. For more than 200 years, the Company has built upon strong family values and prides itself in being a responsible Company, balancing Company interests with those of its employees and the wider community.

Our sustainability strategy is intrinsically linked to advancing Environmental, Social and Governance (ESG) best practices in an ethical and efficient manner within our organisation and helping our clients to advance their own ESG strategies.

Collen is fully committed to continuing our ESG efforts and leading the shift towards a more sustainable built environment. Collen plays a key role by engaging and educating our subcontractors, suppliers and clients on climate risks and providing ESG-focused solutions that help clients achieve their own ESG objectives. Our corporate sustainability strategy seeks to maximise the impact of our own organisation towards our overarching commitment to build greener economies, create more equitable opportunities and contribute to a more sustainable world. For a detailed description of our services please refer to the Annual Reports of Collen AB.

Collen Construction's business model centers on being a leading, family-owned construction company known for quality, excellence, and innovation in the Irish construction industry. Collen focus on building long-term partnerships with clients and are recognised for delivering complex projects on time and within budget. Collen also emphasises a Lean way of thinking to increase efficiency and reduce waste.

Here's a more detailed look at their model:

Key Aspects of Collen's Business Model:

- **Focus on Quality and Excellence:** Collen is renowned for delivering high-quality work and has a strong reputation for building excellence.
- **Long-Term Partnerships:** Collen prioritise building lasting relationships with clients, consultants, and supply chain members.
- **Innovation and Lean Thinking:** Collen embraces innovation and has adopted Lean principles to enhance efficiency and reduce waste in their processes.
- **Data Center Expertise:** Collen are a leading provider of data centers in Ireland, having successfully delivered numerous projects in this sector.
- **Project Delivery:** Collen has a track record of delivering fast-track projects on time, within budget, and to high safety, quality, and environmental standards.
- **Customer-Centric Approach:** Collen strive to understand and meet the unique needs of their clients, building trust and transparency through collaborative project management.
- **Family-Owned and Managed:** The company's family ownership provides a long-term perspective and allows them to build enduring relationships with stakeholders.
- **Diversity and Inclusion:** Collen is committed to creating a diverse and inclusive workplace.
- **4D BIM Implementation:** Collen utilise 4D Building Information Modeling to improve planning, safety, and overall project efficiency.
- **Health and Safety Focus:** Collen prioritises health and safety, driving it from the top down and engaging with site teams to ensure best practices. **ISO Certifications:** Collen hold integrated ISO certifications, demonstrating their commitment to quality, environmental management, and safety. **Global Expansion:** Collen is expanding its presence internationally, including projects in Germany and Sweden.

Collen Values



1. **Safety: Safety is absolute in everything we do as a business.**

Why is it important?

- Construction activities create a high-risk environment everyday
- We want to protect people from harm on our projects
- A safe workplace is fundamental to successful projects

How we show it

- We plan for safe working environments, and we communicate expectations
- We follow our H&S Management system
- We create a strong safety culture that transcends project timelines
- We listen to feedback, and we act quickly to resolve issues
- We invest in training & education

2. **Integrity: Honesty and transparency in our business relationships**

Why is it important?

- Our credibility is paramount to building long-lasting relationships
- The ethos of the business supports an environment of trust and respect

How we show it

- We do the right thing every time
- We set and communicate clear expectations about respectful engagement and ethical business conduct
- We honour our commitments to our clients, our suppliers and our people
- We offer a value proposition that reflects the importance of safety, quality, predictable performance and cost

3. Teamwork: Collaborating with all of our partners

Why is it important?

- Teamwork allows people to make a meaningful contribution and have a sense of pride in their work
- Inclusivity through collective participation increases motivation and leads to a sense of achievement

How we show it

- We actively listen to our colleagues
- We engage and plan together
- We deliver on our promises to our team
- We compromise with give and take for the overall success of the team
- We learn from every interaction to continuously improve

4. Ownership: Empowering people to reach their full potential and leading others to do the same

Why is it important?

- Building trust and positive relationships drive consistent and predictable performance
- Encourages innovation and creative thinking with a solution focused mindset
- Promotes a culture of continuous improvement

How we show it

- We set goals and clear parameters
- We encourage and support our individuals and teams to have full responsibility
- We recognise efforts when ownership is demonstrated
- We reward continuous improvement and constructive feedback

5. Sustainability: Creating an enduring business based on sustainable practices

Why is it important?

- We acknowledge our impact on the natural environment
- We are building a business for future generations
- We want to minimise our impact on the environment, people and communities in which we operate

How we show it

- We take a long term business outlook
- We invest in sustainable practices
- We seek innovative ways to reduce our impact on the environment
- We play our part in a global value chain that supports sustainable business

ESG Materiality Assessment

We are committed to continuously advancing our longer-term ESG strategy, advocacy and oversight. We engage with internal and external stakeholders at all levels on ESG matters on an ongoing basis.

During 2024, we deepened our corporate and community ESG efforts, furthering our commitment to greater sustainability and climate change awareness. We encouraged our employees to participate in our ESG initiatives and engaged with our clients and stakeholders to pursue ESG-related opportunities and accelerate the ESG progress of corporate issuers.

Collen has commenced an ESG materiality assessments¹ to identify and prioritise ESG topics that are influential on our business and important to our stakeholders. At present the topics listed below are Collen's highest priority ESG-related topics:

Own Workforce – Working Conditions
Workers in the value chain – Working Conditions
Own Workforce – Equal Treatment and opportunities for all
Consumers & end-users – Personal safety of consumers and/or end users
Pollution – Microplastics
Biodiversity and Ecosystems – Direct impact drivers of biodiversity loss
Resource use and Circular economy – Resource inflows, including resource use
Climate change – Climate change mitigation
Resource use and Circular economy – Resource outflows related to products and services
Climate change – Energy
Business Conduct – Corruption and Bribery
Biodiversity and ecosystems – Impacts on the state of species
Biodiversity and ecosystems – Impacts on the extent and condition of ecosystems

While these 13 areas are critical to our sustainability strategy, targets, and resource allocation, additional ESG topics are important for our reporting to stakeholders, and to Collen's corporate strategy and culture.

1. Environmental Climate Change Strategy

Climate change and resource scarcity are challenges to society and to business. As a responsible corporate citizen operating as Main Contractor across the globe, Collen endeavors to lessen our environmental impact and make our operations efficient. We understand the importance of making efforts to reduce our carbon footprint and actively promoting sustainable business operations.

Collen's climate strategy endeavors to reduce our greenhouse gas (GHG) emissions, mitigate our corporate climate and biodiversity risk exposure and promote awareness throughout our entire value chain. This strategy is driven by our two separates but linked environmental programs:

- Carbon neutrality program: By utilising our carbon baseline in 2024, KPI's have been set to reduce carbon emissions, energy use, waste and improve employee education.
- Bio-diversity program: By investing in our Bio-diversity project our current plan focuses to maximise carbon sequestration and storage within the forest portfolio. These measures are crucial in enabling the forest to naturally reduce atmospheric carbon dioxide and effectively store carbon within the forest biomass and soil.

In 2021, Collen commenced our carbon reduction programme, gathering accurate baseline Energy and GHG emissions estimates. This involved a review of all available baseline energy usage data. The key focus was to;

- Gather accurate estimate of group Scope 1,2 and 3 Emissions.
- Support data gathering and provide analysis for setting of GHG targets.
- Provided a reporting template to support reporting and monitoring & Annual Carbon Emissions recording.
- Support a closer alignment between Environmental and Sustainability monitoring and reports

Collen GHG Inventory

Scope 1	Scope 2	Scope 3
Direct Combustion for heat/steam/power from fuel consumed onsite; - Natural Gas Fuels used in company cars - Diesel / Petrol <u>Source:</u> Energia Heating bills DCI Fuel bills <u>Recommendations:</u> Improve heating controls and building insulation Use EV / improve driver and vehicle efficiency / minimise unnecessary journeys	Direct -Purchased Electricity Emissions from generation of purchased electricity bought by the company. <u>Source:</u> Electricity Bills <u>Recommendations:</u> Improve energy awareness and reduce losses Increase PV generation if available	Indirect Reporting on emissions from companies actions; Purchased goods and services Waste generated in operations - Waste Disposal by landfill / Recycling / Incineration Business travel Staff commute <u>Source:</u> Invoices for office supplies Waste supplier bills and weights Flight and travel details <u>Recommendations:</u> Waste supplier change to zero landfill and increase recycling Staff awareness to reduce waste Explore offset purchases with flights

Scope 1 – Emissions produced directly from sources owned and controlled by the company.
e.g. Combustion (fossil fuels), company vehicles.

Scope 2 – Emissions produced indirectly from purchased electricity consumed by a company.

Scope 3 – Emissions produced by operations not directly owned or controlled by the company
e.g. Business travel, Waste Generated, Water consumed.

	Head Office		BASELINE YEAR
	Consumption	tCO2 e	2019
Calcd from tabs	S1	Gas/N Gas	9.3
		Company Car	624.0
	S2	Electricity *Location	56,305.9
		Electricity *Market	-
		Renewable Electricity (avoided)	2.3
	S3	Purchased Goods	
		Tonnes Waste (est)	41
		Business Travel	87
outputs	C02e Footprint	S1 & S3	761
		Scope 1	633
		Scope 3	128
reqd inputs	Metrics	Total kWh Electricity Consumed	149,989
		no. Staff at head office	55
		€mill turnover	200
		tonnes waste	110
outputs	KPI Metrics	tCO2 / tCO2 baseline yr	1.0
		kWh PV/ kWh Total HO	4.0%
		kWh/ staff count	2,727
		tCO2/ €mill turnover	3.8
		tCO2/ no. staff	13.8

Correspondence with Collen Finance and Operations / Maintenance ensured a consistent accounting approach across all sites. The program aims to reduce the Collen carbon footprint of our global office, corporate travel, waste and water use, employee commuting and goods and services consumption, among other areas, through the purchase of renewable energy and the Collen Bio- Diversity Project.

Biodiversity Project – Colten's Killerry Forest Sligo

We recognise the urgent need to address environmental challenges, and we are committed to taking concrete actions to minimise our ecological footprint. Recently, Colten has undertaken the development of a nearly 50-acre woodland area in Kilkerry, County Sligo. This significant initiative serves as a prime example of Colten's solid commitment to environmental sustainability.

Phase 1 of the project was completed in June 2022, encompassing the planting of over 2000 Irish trees and the implementation of biodiversity enhancements. Our current plan focuses to maximise carbon sequestration and storage within the forest portfolio. Planting native broadleaves, adding wildflowers, and installing bird and bat boxes are among the measures already completed to enhance the local mammal and biodiversity of the site. These measures are crucial in enabling the forest to naturally reduce atmospheric carbon dioxide and effectively store carbon within the forest biomass and soil. Ongoing operations within the woodland will contribute to both increased carbon capture and enhanced biodiversity, reflecting Colten's dedication to corporate social responsibility and their goal of achieving sustainability and carbon neutrality. A comprehensive carbon assessment has already been conducted, and future measurements will be taken within the next few years to evaluate the extent of carbon sequestration achieved. This project holds immense potential, and further development plans are currently underway.

Located along the Sligo Way and next to the Lake Isle of Innisfree, this forest is an example of Colten's commitment to environmental preservation and sustainability. Colten is collaborating with Veon (forestry management consultants) to further enhance and develop this resource. Recently, Colten's Executive Management Team participated in tree planting followed by a tour of the forest.

The 50-acre forest is home to diverse flora and fauna, our forest supports a vibrant ecosystem, offering a sanctuary for wildlife and plants. The forest hosts 23 different types of birds, red squirrels and even pine marten, one of the rarest species in Ireland. By the end of 2023, Killerry forest was storing 3,526 tons of carbon, which is as much carbon as 842 cars produce in a year. Through additionalities made in the past decade by Colten the forest is currently sequestering an additional 240 tons of carbon per year.

Tree planting Killerry Forest,

Left to right – Derek O' Connor (MD Ireland/UK), David Barron (Technical Director), Leslie Fitzpatrick (Chief Financial Officer), Neil Colten (Chairman), Kara Stuart (Chief Executive Officer)



Internally, the Collen Environmental Team brings together Collen employees who are passionate about the environment, publishes knowledge-based resources, and works to drive sustainable initiatives through our local offices and communities. Collen Environmental Team aims to instill a culture of environmental advocacy and action through educational sessions that focus on sustainable practices along with informative webinars. Collen supports the Environmental Team's commitment to creating positive change throughout the Company and our neighboring communities as we drive to achieve our longer-term net-zero goals.

With respect to our business functions, we account for a relatively small, manageable environmental impact due to the use of natural resources in our global operations. We focus our environmental efforts on a few key areas, including the way we use resources, manage our workspaces, and conduct business travel. These efforts seek to lessen the environmental impact of our organisation by reducing atmospheric carbon emissions, and managing water and waste associated with our business.

Collen also encourages its suppliers to adopt sustainability and environmental practices in line with Subcontractors Environmental Requirements document. To the extent practical and feasible, we expect suppliers to provide us with information to support our reporting and transparency commitments related to sustainability and environmental impacts.

Water

Collen Sweden consumes water in two main categories, office space that we lease from within commercial buildings and operations water usage. Water conservation initiatives are pursued to align to Collen ESG goals with the aim to reduce consumption of all resource categories. Collen Sweden's focus is to make a net positive impact on water demand by:

- Consolidating offices in the same city and selecting office buildings with Green/Energy Certifications and water conserving infrastructure.
- Utilising ISO Certifications systems ISO 14001 & 50001, renewable energy offerings, and sustainability policies, including waste segregation and energy conservation.

Waste

Waste segregation, reduction, recycling and compost diversion are key priorities for Collen. Our Waste Management Plan ensures efficient waste disposal and diversion of recyclable and compostable materials. We also implemented several automated tools to help reduce paper waste and other inefficiencies.

The below table represents the disposal and treatment of waste generated in Collen AB operations in 2022-2023 and covers facilities not owned or controlled by the company.

Site A April 2024 – March 2025

Fraction	2024-Apr	2024-Maj	2024-Jun	2024-Jul	2024-Aug	2024-Sep	2024-okt	2024-nov	2024-dec	2025-Jan	2025-Feb	2025-Mar	SUM	Recovery ra Recovered	Recycling method
Combustible waste													18,581	0%	- Energy
Wood	20,390	4,600	3,100	3,950	14,400	26,950	59,150	60,250	60,670	47,400	97,400	70,750	975,070	100%	975,070 Energy
Cardboard	2,258	0,178	0,158	0,198	3,758	5,238	2,678	3,337	6,036	2,915	7,184	5,543	140,768	100%	140,768 New products
Glass						0,079			0,157	0,315	0,157	0,099	1,062	100%	1,062 New products
Food	1,271	1,040	1,109	0,785	0,993	1,363	1,086	1,086	1,294	1,848		0,231	48,498	100%	48,498 Biogas and biofertilizer
Household waste	0,887	0,676	0,549	0,634	0,591	0,760	0,656	0,676	1,647	3,041		2,880	70,292	65%	45,690 Recovery/disposal
Plastic	14,265	3,168	0,068	3,070	5,353	7,328	10,528	14,568	14,176	13,968	25,219	26,270	336,517	65%	218,736 New products/disposal
Metal	7,640	4,050		2,490		0,010	2,270		4,045		3,350	3,770	348,515	100%	348,515 New products
Paper	0,033	0,067	0,067		0,067	0,067	0,067	0,089		0,166	0,133	0,100	4,651	100%	4,651 New products
Office paper	0,274	0,217	0,198	0,198	0,151	0,132	0,038	0,104	0,132	0,132	0,132	0,132	19,440	100%	19,440 New products
Unsorted waste		1,770				4,000	22,968	1,680	3,630	0,400	13,300	26,260	223,224	65%	145,096 Recovery/disposal
Gypsum							14,290	18,920	17,130	5,670	12,080	9,200	186,690	100%	186,690 New products
Landfill/insulation	4,000					8,420	15,940	23,960	19,240	14,780	17,720	3,220	273,087	0%	-
Bio Hazardous									0,122				0,156	0%	-
Hazardous waste closet		0,136		0,745		0,398	0,158	0,137		0,162	0,066	0,613	6,411	0%	-
Hazardous waste													0,272	0%	- Energy recovery
Sum	51,018	15,902	5,249	12,137	25,313	54,745	129,829	124,807	128,379	90,797	176,741	149,008	2,653,234		
Recoveryrate/month	81,8%	86,8%	95,9%	89,2%	91,8%	76,2%	78,4%	75,9%	79,6%	76,8%	82,3%	84,4%			2,134,215 80,4%

Site B April 2024 – March 2025

Fraction	2024-Apr	2024-Maj	2024-Jun	2024-Jul	2024-Aug	2024-Sep	2024-okt	2024-nov	2024-dec	2025-Jan	2025-Feb	2025-Mar	SUM	Recovery rat Recovered	Recycling method
Combustible waste					1,960				1,920				4,325	0%	- Energy
Wood	68,730	68,490	47,650	40,050	47,680	66,290	79,690	94,700	60,650	99,220	123,550	83,590	1,460,320	100%	1,460,320 Energy
Cardboard	6,260	3,400	5,380	8,460	5,940	6,900	9,260	6,380	11,070	4,990	7,598	7,370	178,078	100%	178,078 New products
Glass		0,118	0,118			0,118	0,118		0,118	0,079	0,079	0,039	4,208	100%	4,208 New products
Food	0,739	0,693	0,485	0,416	0,439	0,782	0,855	0,785	0,718	0,647	0,970	1,063	23,428	100%	23,428 Biogas and biofertilizer
Household waste	2,304	3,504	3,840	6,144	6,144	6,144	6,144	6,528		2,953	3,810	2,260	149,832	65%	97,391 Recovery/disposal
Plastic	17,858	21,064	22,635	22,001	18,942	20,701	26,277	26,023	27,578	25,383	47,749	34,690	518,654	65%	337,125 New products/disposal
Metal	1,460	6,930	6,680	5,200	3,040	10,575	5,110	5,085	5,945	5,590	7,720	7,585	118,845	100%	118,845 New products
Paper	0,055	0,133	0,133	0,166	0,122	0,133	0,133	0,189	0,189	0,200	0,200	0,277	4,972	100%	4,972 New products
Office paper	0,038	0,152	0,057	0,171	0,114	0,057	0,114						4,822	100%	4,822 New products
Unsorted waste		8,160		1,060	2,304		1,800	8,460	1,570	1,000	23,250	11,940	195,987	65%	127,392 Recovery/disposal
Gypsum	12,780	8,020	9,440		5,500		23,460	15,850	11,260	7,200	11,740	2,880	179,230	100%	179,230 New products
Landfill/insulation	17,070	15,160	14,360	10,120	4,860	8,560	13,020	13,680	21,590				240,779	0%	-
Hazardous waste closet			0,474	0,685		0,653	0,390	0,233	0,176	0,166	0,098	0,278	9,630	0%	-
Bio Hazardous													0,128	100%	0,128 Energy recovery
Construction waste		66,600	5,120	12,860									174,840	100%	174,840 New products
Sum	127,434	202,424	126,254	107,451	97,045	120,893	166,838	164,233	134,672	168,978	226,764	151,932	3,477,277		2,930,978 83,7%
Recoveryrate/month	81,1%	86,9%	80,0%	86,4%	81,1%	84,6%	84,8%	91,1%	80,8%	81,0%	86,4%	88,6%			

Fraction	2024-Apr	2024-Maj	2024-Jun	2024-Jul	2024-Aug	2024-Sep	2024-okt	2024-nov	2024-dec	2025-Jan	2025-Feb	2025-Mar	SUM
Combustible waste	0%	0%	0%	0%	2%	0%	0%	0%	1%	0%	0%	0%	0%
Wood	54%	34%	40%	37%	49%	55%	48%	56%	43%	59%	54%	55%	42%
Cardboard	3%	2%	4%	6%	6%	6%	6%	4%	8%	3%	3%	5%	5%
Glass	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Food	1%	0%	0%	0%	0%	1%	1%	0%	1%	0%	0%	1%	1%
Household waste	2%	2%	3%	6%	6%	5%	4%	4%	0%	2%	2%	1%	4%
Plastic	14%	10%	19%	20%	20%	17%	16%	16%	20%	13%	21%	23%	15%
Metal	1%	3%	6%	5%	3%	9%	3%	3%	4%	3%	3%	5%	6%
Paper	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Office paper	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Unsorted waste	0%	4%	0%	1%	2%	0%	1%	5%	1%	1%	10%	8%	6%
Gypsum	10%	4%	8%	0%	6%	0%	14%	10%	8%	4%	5%	2%	5%
Landfill/insulation	13%	7%	12%	9%	5%	7%	8%	0%	10%	11%	0%	7%	7%
Hazardous waste closet	0%	0%	0%	1%	0%	1%	0%	0%	0%	0%	0%	0%	0%
Bio Hazardous	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Construction waste	0%	33%	8%	12%	0%	0%	0%	0%	0%	0%	0%	0%	3%
Sum	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

The overall waste diversion rate for this reporting period across both projects was 83,5 a .7% increase on last year's 82.8 % waste diversion rates. We are actively actioning strategies to further reduce our waste to landfill figures by working with suppliers and new innovations.

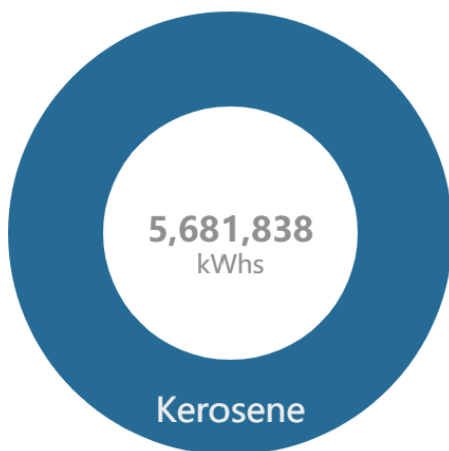
Energy

Energy consumption, the reduction of energy demand and its corresponding Greenhouse Gas emissions is a high priority for Collen. Greenhouse gas emissions related to energy consumption throughout the organisation globally is the main source of Collen Groups' operational emissions and is an area that Collen can control and impact through changes in operations, strategy and policies. Our key focuses are:

- Reduce energy requirements, corresponding greenhouse gas emissions and waste generation of our global operations through thoughtful sustainable initiatives and strategies. Some of these strategies include:
 - occupancy and vacancy sensors are installed throughout the Collen office spaces to automatically turn off the office space lights to save on energy consumption.
 - when office and data center infrastructure and equipment approach end of life, replacing it with newer more energy efficient and/or sustainable products.
 - Upgrading of site cabins to ensure they are energy efficient.

2024 Stats

Consumption (kWh)



Projected figure
5,614,502 kWhs Per Year.
74% decrease on last business year ↓

Carbon (tonnes CO₂e)



Projected figure
1,442.9 Carbon (tonnes) Per Year.
74% decrease on last business year ↓

2. Social

Human Capital Management

The company's most valuable asset is its people, and Collen has made deliberate investments to ensure that it remains an employer of choice to attract, retain and develop top talent. Collen strives to create a work environment in which individuals are empowered to establish their own work objectives, aligned with Collen's overall business strategy and within the context of their area of discipline.

Collen has extended its commitment to attracting, retaining, developing, and motivating its employees throughout 2023/2024, by adding new professional development opportunities to bring internal job opportunities.

Employee Demographics

The following table illustrates Collen Sweden employees gender distribution by career level for reporting period 01/04/2024 -30/03/2025.

Sweden		
Career level		
	Female	Male
Executive	0	3
Senior	1	33
Mid	30	112
Entry	12	5
Not Disclosed		

Employment contract for Collen Sweden (Permanent & Temporary) by gender:		
-Permanent (Regular employees)		
-Total: 196		
Employment type for Collen Sweden (full-time & part-time by gender:		
-Female		43 Full-time
-Male		153 Full-time, 1 fixed term
-Undecided (Not declared, sero data)		

Attracting and Retaining Employees

Our people are the primary driver of our success. Collen is committed to attracting top talent and retaining, developing and motivating our employees.

We are actively working to establish Collen as a destination employer, having created a dedicated Talent Attraction team and establishing key partnerships to attract diverse talent in across all markets in which we operate. To continue strengthening our employer brand, we launched our newly designed website during 2022, to provide a much better candidate experience. We seek to hire locally wherever possible, for all levels, additionally, we introduced new hire and employee exit surveys to better understand why employees join, and leave, Collen.

Workforce Attrition rate 5.45%

Growth and Advancement

Collen's Annual Review program has been established to enhance the job performance and professional growth of each employee. Under this program, every employee is asked to create a professional development plan for themselves each year, in concert with their manager, and record this plan in our HR software M Files.

In 2024, we continued to assess the current state of our talent, define the skills needed to achieve our strategic goals, set performance objectives to measure individual growth, provide opportunities for skills development and utilise the process to advance talent equitably

In addition to providing mechanisms for ongoing feedback throughout the year, managers informally assess his or her employees in writing during the mid-year period and complete a formal year-end performance review by the end of each calendar year.

Training and Education

Collen supports the development of its employees through each important transition in their careers, as new entrants to the organisation, as developing professionals, as managers of teams and people and as leaders who lead the global organisation. In Q1 2024 Collen appointed a Learning & Development Manager to further enhance training and continuous professional development for all Collen employees. Roadmaps have been established for each division and department which align with Collen core values, Sustainability being one of them.

Wellness and Financial Security

At Collen our focus on health & safety, inclusion, collaboration, and wellbeing is unparalleled. We live our family company values, placing Collen team members at the heart of the company. As Collen continues to grow, the company actively seeks new talent to join the exciting journey. Strong family values make Collen a supportive, attractive, and exciting place to work and build successful careers.

The employment offer at Collen is compelling, competitive, and developed in partnership with Collen employees to reflect what matters most to them. The total reward package at Collen includes:

- ✓ Competitive Salary
- ✓ Pension, Life assurance & income protection benefits throughout employment.
- ✓ Development and further training opportunities for shaping and realising career goals.
- ✓ Education opportunities to support 3rd level education.
- ✓ An opportunity to access and progress professional memberships to Charterships.
- ✓ Global mobility support to expand employee horizons within Collen while developing knowledge while forging a successful career.
- ✓ Generous family leave and flexible working options.
- ✓ A supportive and generous framework of employee leave policies.
- ✓ Travel benefits or company car depending on location of the position.
- ✓ A Diverse & Inclusive environment where a dedicated Diversity and Inclusion committee work collaboratively to make positive changes at Collen.
- ✓ Employee Assistance Program – The (EAP) is a purpose-built service that offers a vehicle for employees to resolve varied, personal or work-related concerns, which can influence performance in the workplace.
- ✓ Community Programmes - Collen support local organisations, schools and colleges in each company location. Employees are encouraged and have the opportunity to engage with the community initiatives which most appeal to their personal interests.

Diversity, Equity and Culture

The Collen Diversity Committee is responsible for ensuring equitable employment and career development practices across the company, as well as fostering a culture of inclusion and belonging for all. During 2023, we focused on educating our employees on diversity topics, including optional diversity training for all employees, and required inclusive leadership training for all managers.

Collen attained the Investors in Diversity Silver Award on the 31st of January 2023 from the Irish Centre for Diversity in recognition of its diversity and inclusion programme.

The accreditation benchmarks Collen against other bodies and affirms that it has both embedded diversity and inclusion practices throughout the organisation as well as developed and fostered a sense of fairness and belonging among all colleagues. A series of initiatives are planned by the Collen Diversity and Inclusion committee annually to keep diversity and inclusion in focus and support areas for further development.

The successful accreditation demonstrates Collen's commitment to promoting a positive working environment where everyone feels valued, respected and included.

Additionally all subcontractors appointed by Collen for our Swedish projects are provided with the Supplier Code of Conduct to ensure alignment in business practices with the client's expectations. Collen is developing a system of greater subcontractor engagement that assists in supporting diversity and inclusion along with safety and sustainability deliverables. Collen has a rich tradition of supporting local charities and communities, through charity events and fundraising, which offer support services to disadvantaged groups, such as women's refuge, youth in disadvantaged areas, access to apprenticeship, suicide prevention and mental health. CSR is an active part of the Collen culture and extends to all regions of active operations.

Data and Information Privacy

In January 2021 Collen achieved ISO 27001 accreditation, this international standard for information security requires organisations to identify information security risks and select appropriate controls to tackle them. Those practices are outlined in Annex A of ISO 27001, which contains 114 controls divided into 14 domains.

Reflecting the unique risks and potential harm posed by mishandling or misuse of personal data, Collen's GDPR Policy in conjunction with the ISO 27001 accredited information security system builds on the foundation of our information security program to apply special governance, policies, procedures and training on the use, handling and processing of personal data and performance of activities that impact privacy rights (as determined by the jurisdictions in which we operate).

Collen appreciates the special obligations that apply to processing personal data and individuals' rights to privacy and personal data protection. Collen's privacy compliance program is designed to enable adherence to laws and regulations applicable to personal data that it processes, including, as applicable, the European General Data Protection Regulation (GDPR) as well as its posted Privacy Policy and contractual commitments to customers, vendors and other counterparties.

Our personnel are expected to protect and secure the confidentiality of non-public information that they receive, access or create in connection with their work at the company. This includes adhering to any laws, regulations and/or non-disclosure agreements that restrict the use of data (including personal data), require measures to safeguard it, and limit disclosure of information. It also requires that personnel limit their use of information technology assets (e. g., laptops, phones and other devices) to permitted activities so that data is not put at risk, and that they promptly report any suspected improper use or potential disclosure of data. Collen has numerous policies in place to further safeguard our technology and use thereof, including:

- Acceptable Use policy
- Data Classification policy
- Information Security policy
- Mobile Device policy

We provide training on overall information security to all our employees on a regular basis. The company works continuously, education and training of all employees, which ensures that employees are well informed about data security and ethical handling of personal data and other data.

Collen expects that its suppliers share our commitment to data and information privacy by complying with the Collen Supplier Code. As stated in the Supplier Code, Collen expects suppliers to comply with applicable laws and regulations and contract terms relating to personal data and privacy including laws and regulations of the jurisdiction where personal data originated. Suppliers must disclose all jurisdictions in which they intend to process data on behalf of Collen and provide all information requested by Collen to assess the transfer of personal data to such locations.

To support these principles, Collen maintains a comprehensive and consistent set of information security documentation and requirements intended to protect the security, reliability, integrity, accuracy, confidentiality, and availability of Collen information assets. These documents record the security controls and personnel responsibilities established to protect Collen information and information systems against both accidental and unauthorised access, modification, interference, disclosure, and destruction. These include our Information Security policies, which apply to personnel (full-time and part-time employees, and contractors) working for Collen. Within this reporting period, no breaches to our information systems were reported/identified.

Human Rights

Collen supports fundamental human rights—both inside and outside our company—and demonstrates its commitment by enacting responsible workplace practices across our global enterprise. Collen believes in the fundamental dignity of every human being and the rights of every individual to live and work safely and humanely, without fear of oppression or coercion.

A critical risk for human rights relates to operations of listed companies that operate in areas where the enforcement of national legislation and international conventions might be limited. Our Vision, Mission and Values Statements, along with our Code of Ethics and Employee Handbooks, emphasise responsibility, integrity, and values-based decision-making and set forth our standards for conducting our business ethically and consistent with our moral principles.

These principles and standards shape our interactions with fellow employees, clients, suppliers, communities, and markets around the world—and with our community of shareholders, too. Collen are foundational to our company and enable our continued success. Collen has incorporated within its Code of Ethics, corporate policies, or programs specific requirements to put the following principles into practice:

- Equal Employment Opportunity and Discrimination
- Dignity at Work
- Grievance Policy
- Diversity and Inclusion
- GDPR
- Health and Safety at Work
- Information Security Policy

Human rights are reinforced through training and effective employee communication, including inductions and webinars. Collen views human rights due diligence as a continuous process, which we constantly adapt and improve. We acknowledge the responsibility to respect human rights as outlined in the UNGP.

3. Governance

Business Ethics and Integrity

The Collen Business Ethics and Integrity Policy is designed to meet or exceed available standards, including guidelines by European regulators. Collen embraces good governance by holding ourselves to the highest ethical standards in all interactions.

Collen values its reputation for ethical behavior, financial honesty, integrity, and reliability. There are a number of fundamental principles and values which it believes are the foundation of sound and fair business practice and as such are important to uphold. The trust and respect from Collen employees, clients, customers, stakeholders, and the general public are assets that cannot be bought and are the foundation for success. For these reasons all employees must conduct themselves in adherence with these principles and values. The impact of any wrongdoings and unethical behavior upon our business could be both damaging and detrimental.

Every employee has a right to expect that our business maintains proper standards, and everyone has a duty to maintain these standards through their decisions, actions and what they say. A heavier responsibility is borne by those who hold positions of authority. Collen must openly demonstrate leadership in applying the business practices outlined in the Business Ethics and Integrity Policy.

The Policy is supported by the Board of Directors and shall be reviewed from time to time. It covers the main issues that may be encountered at work, and sets out standards of professionalism and integrity to be maintained by individuals.

All employees have the right and the responsibility to resolve doubts or uncertainties about ethical questions and should, in the first instance, contact their manager for guidance prior to taking any action. An 'open door' policy is encouraged in Collen so that, if necessary, such queries can be brought to the attention of higher levels of management.

A Whistle-blowing Policy and Procedure is also in place where specific concerns can be raised without fear of discrimination.

Collen's Key Business Principles

The key Business Principles are outlined below:

Discrimination or harassment of any kind will not be tolerated

Fair terms of employment are provided to all employees together with appropriate opportunities to develop skills and progress in their careers.

The diversity of workforce is strength to the business. All employees regardless of their colour, race, religion, gender, marital status, sexual orientation, disability or age will be treated equally, with fairness, honesty, respect and dignity. Harassment (including sexual, physical, mental, use of abusive language or offensive gestures) or bullying, in any shape or form will not be tolerated. Any employee who is proved to have acted in a discriminatory manner or to have indulged in bullying or harassment will be subject to disciplinary action and all employees are strongly encouraged to report such incidents.

A safe and healthy environment will be maintained for people to work in

Collen recognises its responsibility and the benefits of providing a safe working environment. We aim to comply with legislative, safety rules and procedures through preventing accidents from happening. We do this by understanding the risks present in our working environment and how accidents can occur. Health and Safety processes are in place to reduce risks within the workplace.

All within the Collen organisation have a responsibility for safety in the workplace, and we must:

- Be familiar and comply with our Health and Safety Policy and all local operating procedures.
- Think through and identify the risks and hazards in our working environment.
- Intervene immediately if someone is putting themselves or others at risk.
- Report all safety risks promptly to a manager or Health and Safety representative. We will be proactive in

managing our responsibilities to the environment.

- Each has a personal and collective responsibility to use resources efficiently and give consideration to the impact of our products and operations on the environment, and to take steps to address these.

It is recognised that day-to-day operations have the potential to damage the environment. To keep this impact to a minimum, resources must be managed efficiently to minimise waste. Responsibility is taken for reducing the use of energy, water and other materials and trying to recycle where possible. To this end, Collen has established an Environmental Department and to develop and deliver an effective Sustainability policy.

Confidentiality

Everyone within Collen has a responsibility to keep confidential all information relating to the business as well that of our clients, customers and suppliers.

Every employee should take steps to ensure that confidential information is protected. This applies to confidential information regarding Collen's employees, clients, customers and suppliers. Under no circumstances should such information be disclosed to third parties including the media. This obligation continues when an employee leaves the business.

The confidentiality obligations contained in this Policy are in addition to any obligations detailed in employment contracts, any policies and other documentation issued.

No bribes can be given or received

Collen, nor any of its employees, will offer, give or receive bribes or inducements of any sort for any purpose.

A bribe includes any payment, benefit, or gift offered or given with the purpose of influencing a decision or outcome. The payment may not be of large value and it could be as simple as a lunch or for example, an invitation to a sporting event. We are each responsible for knowing what our business guidance allows and what the law permits regarding gifts and benefits given to or received from clients, customers, suppliers or other third parties. The Company has in place a Business Gifts Policy which must be followed. If in doubt, seek guidance and approval from your manager before accepting or giving any gift or entertainment.

Conflicts of interest must be avoided and in all cases must be reported

Everyone has a responsibility to disclose and seek direction on any issues that may potentially conflict with our responsibilities to the business.

Conflicts of interest happen in situations where competing interests conflict and impair our ability to make objective and unbiased business decisions. A conflict of interest can take many forms, including; managing or recruiting a family member or friend; having a second job or holding financial interests in suppliers, clients or customers. In all cases a conflict must be disclosed to a manager as soon as it becomes apparent.

Anti Bribery

Collen commits to compliance with all laws, rules and regulations governing anti bribery and corruption law. Under EU law, bribery and corruption is punishable for individuals, and if the business is found to have failed to prevent bribery or taken part in corruption it could face an unlimited fine, be excluded from tendering for Government contracts and face untold damage to its reputation.

Under EU law the payment, or offer to pay bribes, or the provision of or offer to provide gifts or anything of value or other advantage for improper purposes to obtain or retain business or any other benefit, (whether for the Company or any other party) is prohibited. Such payments or gifts are also forbidden under the terms of this Policy and may result in immediate dismissal for those involved in their payment or receipt.

Collen recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Collen's aim therefore is to limit any exposure to bribery by:

- Setting out a clear anti-bribery stance;
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others;

- Encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

Appropriate internal controls are in place which will evidence the business reason for making payments to third parties.

Related Policies

- Business Gifts Policy
- Code of Conduct
- Disciplinary Policy
- Whistle-blowing Policy
- The above list is not exhaustive and other policies may be applicable

Risk Management

Collen's Risk Management Committee has established an Enterprise Risk Management (ERM) framework to identify, assess, monitor, measure, and treat risks, including information-security risks. The Risk Management Committee facilitates ERM Framework execution within Collen's business units and expert functions, coordinates risk management activities across the Company, and aggregates and reports risk information on a regular basis.

Information and Cyber Security

The information security department is responsible for coordinating the protection of the Collen Group's core business operations and information against real-world cyber threats, by employing technology, policy, processes, education programs, and sound design techniques across the organisation. Collen's Chief Information Officer (CIO) who reports directly to Collen's CEO manages the Information Security Department (ISD).

The ISD team is responsible for:

- Maintaining and implementing Collens ISO 27001 Information Security System;
- Performing and coordinating security assessments and vulnerability scans of Collen's internal, external and third-party applications;
- Implementing and maintaining Collen's various information security-related policies and standards;
- Middleware and vulnerability management in addition to special projects as designated by the CIO;
- Collen's compliance efforts for General Data Privacy Regulation (GDPR) and all supporting data privacy and protection efforts;
- Configuring Collen Group infrastructure and the applications running thereon in accordance with Collen's configurations policies, processes and standards;
- Monitoring threats against Collen, and providing recommendations for securing potentially vulnerable populations at Collen in the context of emerging threats.

On an annual basis, the Information Security team reviews and updates its governance documents, and then presents the revised documents to the Audit & Risk Committee for review and/or approval.

Our Audit & Risk Committee receives reports, as well as additional reports as needed, on cybersecurity and information security matters from our Chief Information Officer. The Collen Information Security Management System (ISMS) that governs the global enterprise infrastructure and supports key global information security processes, and includes technology, personnel, locations and data centers, conforms to ISO 27001 requirements and is ISO 27001 certified.

Other sources

For further information on Collen efforts relating to sustainability, please refer to the Collen Sustainability Page <https://www.collen.com/about/sustainability>

Appendices

1. Sustainability Policy
2. Modern Slavery Policy
3. Business Ethics & Integrity Policy
4. Anti-Bribery & Anti Corruption Policy
5. Anti Money Laundering Policy

Sustainability Policy

1. Commitment

Collen is committed to achieving the highest standards with regards to the impact of its activities on the three core pillars of sustainable development: environment, economic and social. The Company strives to continually integrate better sustainable practices within the organisation and in doing so, meet the needs of the present while respecting the requirements of future generations. Collen supports a greener economy; offers added value to clients and will help Collen to make significant contribution in the fight against climate change through limiting adverse effects of resource usage on the environment. Collen works closely with its suppliers to create synergy within the supply chain. We are committed to the reduction of pollution and are proactive in managing this through our Management Systems. The Company promotes positive social responsibility and good community relationships in the areas it operates through the generation of local employment, which contributes to inclusive growth, and consideration for inhabitants in close occupation of its operations. For over 200 years, the Company has built upon strong family values and prides itself of being a responsible Company, balancing Company interests with those of its employees and the wider community. Collen ensures ongoing compliance with all relevant environmental legislation, regulations, codes of practice and other standards which enhance sustainability in Ireland.

2. Aim and Scope

Collen aims to reduce the impact caused directly or indirectly through our operations. Collen acknowledges its responsibilities to sustainable development through the creation of this Policy and the measures introduced to contribute to sustainability in all jurisdictions in which we operate. An integral part of strategic planning for the Company is the creation of targets to achieve sustainability best practice across the three key areas: environment, economic and social. These targets are developed and integrated into the organisation through specific policies which are at the forefront of all operations. By developing a comprehensive Environmental Management System (EMS) of processes and practices, this will enable the Company to reduce its environmental impact and increase its operating efficiency, as well as ensure compliance with all relevant environmental legislation, regulations, codes of practice and other standards. Economic and Social impact will be incorporated into the EMS to deliver a robust system for sustainability. All employees of Collen have duties and responsibilities under this policy to ensure the objectives are met.

3. Objectives:

Collens EMS shall evaluate and provide clear direction together with a consistent approach to sustainable development. It will be adopted at all levels within the organisation and reviewed regularly to ensure it meets best practice. The Company's EMS is certified to ISO 14001:2015 and ISO 50001:2018 by NSAI and is expected to continually develop so that new challenges in delivering sustainability can be addressed.

Sustainable Consumption and Production

- Promote sustainable building concepts to clients, utilising the EC3 calculator to do so.
- Identify opportunities to reduce waste including takeback programmes with suppliers.
- Reduce waste generation by 10% based on 2023 figures, measured in tonnage generated per 100K turnover.

Climate Change and Clean Energy

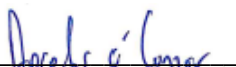
- We will reduce our carbon intensity by 25% from our 2019 baseline by 2025. Measured in CO₂e/€m t/o
- Embed ISO 50001 throughout all activities within the company to manage and reduce energy wastage.
- Continue investment in renewable energy sources in both head office and temporary site locations.
- Improve energy management performance within Collen (Scope 1 &2) and the supply chain (Scope 3).

Nature Positive

- Boost carbon capture and enrich biodiversity via the Collen Biodiversity Initiative.
- Advocate for the adoption of a circular economy methodology in all operations.
- Promote the implementation of eco-friendly vertical gardens and green roofs in projects.

Economic and Social:

- Work with local communities to promote mutually supportive practices and co-operative efforts.
- Support socioeconomic regeneration by employing and nurturing a local work force.
- Provide world class Health & Safety whilst promoting the Collen Creating Safer Sites Programme.
- Promote the Collen Investors in Diversity Silver Award from the Irish Centre for Diversity to achieve DEI goals.
- Promote Equal Opportunities and Fair Employment within the organisation.
- Improve Environmental knowledge within Collen through the delivery of the Collen Sustainability Series CPD's



Derek O'Connor

Managing Director - Ireland & UK

MODERN SLAVERY POLICY

Version 01

Approval Date: 01 October 2024

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Version	Document No	Document Title	Reviewed by (Owner)	Approved By	Date of Approval
01	CCGL24.1.3	Modern Slavery Policy	Legal and Compliance Dept.	EMT	01 Oct 2024

Revision History

Version	Date	Change Description
01	27.02.25	First release

Classification code: Please select as required:

Internal	<input type="checkbox"/>
External and Internal	<input checked="" type="checkbox"/>

MODERN SLAVERY POLICY

1. Overview and how we define modern slavery

- 1.1 Slavery, forced labour, servitude, and human trafficking are types of “modern slavery” – criminal activities that deprives victims of their liberty and usually involves financial and other exploitation.
- 1.2 Collen (the “Company” or “we”) conducts our business fairly, ethically and with respect to fundamental human rights. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This anti-slavery statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or our supply chains.
- 1.3 You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, contractor, sub-contractor, director, officer, worker, consultant, volunteer, supplier or service provider.
- 1.4 Failure to comply with the principals of this policy by employees may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.
- 1.5 If you are an employee, this policy does not form part of your employment contract, and we may update it at any time. You remain required to comply with this and all policies of the Company as amended from time to time.

2. Preventing modern slavery in our business

- 2.1 We carry out appropriate and legally permissible checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf. Our recruitment processes are both transparent and thorough. We have robust procedures in place for vetting new employees and ensuring we are able to accurately confirm their identities.
- 2.2 We give every employee a written employment contract, and he or she is remunerated in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

3. If you are one of our suppliers

- 3.1 As part of our commitment to comply with this policy we will both continue to monitor and mitigate any risks within our Company and our supply chain, so that effective controls and contingency plans can be put in place if required.

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- 3.2 We ensure our supply chain prequalification procedures are robust and include appropriate provision for ascertaining the measures taken by our supply chain to help eradicate modern slavery. Our procedural controls are reinforced by our strategic procurement approach to developing preferred supplier relationships with key supply chain partners, including for example labour and logistics providers with whom we work repeatedly and know very well.
- 3.3 If you supply us with goods or services, you must assess your business and supply chains and confirm that you:
- Comply with your legal obligations, in relation to modern slavery; and
 - Are committed to ensuring there is no modern slavery taking place in your business, or in any of your supply chains.
- 3.4 If a supplier or service provider breaches this policy or are found to have modern slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.
- 4. If you are an employee or a worker providing services for us**
- 4.1 You must immediately report any suspicions of modern slavery in our business or supply chains to us.
- 4.2 You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our Compliance Officer and, if you are an employee, refer to our Grievance and Protected Disclosure Policies.

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BUSINESS, ETHICS, & INTEGRITY POLICY

Version 01

Approval Date: 01 October 2024

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Version	Document No	Document Title	Reviewed by (Owner)	Approved By	Date of Approval
01	CCGL24.1.2	Business, Ethics, & Integrity Policy	Legal and Compliance Dept	EMT	01 Oct 2024

Revision History

Version	Date	Change Description
01	27.02.25	First release

Classification code: Please select as required:

Internal	<input type="checkbox"/>
External and Internal	<input checked="" type="checkbox"/>

BUSINESS, ETHICS, & INTEGRITY POLICY

1. Overview and the policy

- 1.1 Collen (the “Company” or “we”) aims to be a leader in both creating and sustaining a high-performance culture and setting industry standards. Nowhere is that more applicable than in the integrity with which we conduct our business. This is why it is important for every one of us to make a personal commitment to follow our Business Ethics & Integrity Policy. These principles and policies provide guidance to help us keep that ethical commitment.
- 1.2 You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, contractor, sub-contractor, director, officer, worker, consultant, volunteer, supplier or service provider. **All consultants, contractors and subcontractors must complete and return the signed declaration as provided at Schedule One.**
- 1.3 Failure to comply with this policy may result in disciplinary action, including dismissal, or, in other cases, termination of the contract between you and us. It could also involve other legal steps being taken against you.
- 1.4 Company leaders are responsible not only for their own actions, but for fostering a culture where compliance with the law, regulations and company policies is fundamental to all of our business activities. Managers must set the right example for their teams and address concerns about appropriate conduct promptly, and with care and respect.
- 1.5 If you ever have a question or concern about what conduct is proper, for you or anyone else, you are urged to promptly raise the issue with your line manager.
- 1.6 The policy asks that you:
- Obey all laws governing our business conduct worldwide.
 - Exemplify integrity in all Collen activities and relationships.
 - Make safety a priority and a passion.
 - Avoid conflicts of interest between work and personal affairs.
 - Foster a fair and inclusive workplace free of bullying or harassment.
 - Build a culture where ethical conduct is recognized, valued and exemplified by all employees.

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- 1.7 If you are an employee, this policy does not form part of your employment contract, and we may update it at any time. You remain required to comply with this and all policies of the Company as amended from time to time.

2. Business integrity

2.1 Training

In order to promote awareness and understanding of the policies and principles set out in the policy, the Company has several training and monitoring initiatives. Completion of training is mandatory for all employees periodically when notified. Supervisors and line managers are required to ensure that employees are fully familiar with the policy and all other policies adopted by the Company applicable to such employee's job.

2.2 Oversight and monitoring

The Company has a Compliance Officer under overall oversight of the Executive Management Committee. The Compliance Officer will regularly monitor and report on compliance with the policy.

2.3 Work and external environment

The Company treats each employee fairly and with respect and provides equal employment opportunities without regard to any distinctions based on age, civil status, disability, family status, gender, membership of the Traveller Community, race, religion, sexual orientation, in accordance with the law.

The Company is committed to provide safe and healthy working conditions for all employees free from bullying and harassment including all forms of sexual, physical and psychological harm. You must refrain from engaging in any form of bullying and harassment.

The Company is committed to responsible environmental practices and complies with all laws and regulations relating to the protection of the environment. You must ensure that you adhere to all such laws and regulations in the performance of your duties.

2.4 Fair dealing and fair competition

The purpose of competition laws is to provide a level playing field to economic competitors and to promote fair competition. No employee, under any circumstances, may enter into any understanding or agreement with an actual or potential competitor that would illegally limit or restrict in any way either party's actions.

We strive to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your line manager.

You are expected to deal fairly with our customers, suppliers, employees and anyone else with whom you have contact in the course of performing your job.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favours.

3. Business practices

3.1 Recordkeeping and internal controls

Please refer to our Anti-Bribery & Anti-Corruption Policy for information on Collen's policy on recordkeeping and internal controls.

3.2 Safeguarding property

All employees are expected to protect our assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. Our property, such as office supplies, computer equipment, buildings, and other corporate assets, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. You may not, however, use our corporate name, any brand name or trademark owned or associated with the Company or any letterhead stationery for any personal purpose.

You may not, while acting on behalf of the Company or while using our computing or communications equipment or facilities, either:

- access the internal computer system (also known as "hacking") or other resource of another entity without express written authorization from the entity responsible for operating that resource; or
- commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (also known as "spam") in violation of applicable law, trafficking in contraband of any kind or espionage. Please also refer to our IT policy.

If you intend to send unsolicited bulk email to persons outside of the Company, either while acting on our behalf or using our computing or communications equipment or facilities, you should contact your supervisor or line manager for approval.

3.3 Confidentiality

One of our most important assets is our confidential information. As an employee of Collen, you may learn of information about the Company that is confidential and proprietary. You also may learn of information before that information is released to the general public. Employees who have received or have access to confidential information should take care to keep this information confidential. Confidential information includes non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed, such as business, marketing and service plans, financial information, product architecture, source code policies, engineering and manufacturing ideas, designs, databases, customer lists, pricing strategies, personnel data, personally identifiable information pertaining to our employees, customers or other individuals (including, for example, names, addresses, telephone numbers and social security

numbers), and similar types of information provided to us by our customers, suppliers and partners. This information may be protected by patent, trademark, copyright and trade secret laws, and data protection law.

In addition, because we interact with other companies and organisations, there may be times when you learn confidential information about other companies before that information has been made available to the public. You must treat this information in the same manner as you are required to treat our confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company.

This policy requires you to refrain from discussing confidential or proprietary information with outsiders and even with other Company employees, unless those fellow employees have a legitimate need to know the information in order to perform their job duties.

You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, computer disks and laptop computers, should be stored securely. Unauthorised posting or discussion of any information concerning our business, information or prospects on the internet is prohibited. All Company emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of the Company, except where required for legitimate business purposes.

3.4 Communications

You are expected to be truthful and clear in your verbal and written communications and to not be intentionally misleading to colleagues and others such as internal or external auditors. Communications with the media, and regulators etc. are the responsibility of designated Collen employees. Communications on social media sites are also subject to this policy.

3.5 Illegal Payments

The Company is subject to anti-money laundering legislation, in particular the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 as amended by Part 2 of the Criminal Justice Act 2013 and by the Criminal Justice (Money Laundering and Terrorist Financing) (Amendment) Act 2018. You are expected, when making a payment on behalf of the Company to make sure that such a payment is in line with our anti-money laundering procedures more particularly set out in Collen's Anti-Money Laundering Policy.

Prior to entering into a business transaction, or upon the extension or renewal of an existing contract, you are required to make appropriate inquiries commensurate with risk and significance of inadvertent violation of the above policies regarding all the foreign business partners, consultants, agents, third part intermediaries, suppliers and acquisition targets.

Please refer to our Anti-Bribery & Anti-Corruption Policy.

3.6 Conflicts of Interest

We respect the rights of our employees to manage their personal affairs and investments and do not wish to impinge on their personal lives. At the same time, employees should avoid conflicts of interest that occur when their personal interests may interfere in any way with the performance of their duties or the best interests of the Company. A conflicting personal interest could result from an expectation of personal gain now or in the future or from a need to satisfy a prior or concurrent personal obligation. We expect our employees to

be free from influences that conflict with the best interests of the Company or might deprive the Company of their undivided loyalty in business dealings. Even the appearance of a conflict of interest where none actually exists can be damaging and should be avoided. Whether or not a conflict of interest exists or will exist can be unclear.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or line manager of the Company, you should discuss the matter with the appropriate Director/ or Compliance Officer.

3.7 Corporate opportunities

You may not take personal advantage of opportunities for the Company that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be preapproved. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way.

3.8 Secondary employment

No employee shall engage in secondary employment without first obtaining prior written approval from your supervisor or line manager and the Human Resources Department. Under no circumstance will secondary employment with a Company competitor, supplier, contractor, consultant or third party be permitted.

3.9 Disregard of policies and procedures

No employee who exercises supervision or influence over another employee shall direct, request or encourage that other employee to do anything or make an omission, the result of which is contrary to any policy, procedure, rule of the Company or any applicable law. You are required to immediately report all situations in which any person attempts to direct, request or encourage you to violate policy, procedure, rule of the Company or any applicable law to your supervisor or line manager.

Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.

4. Gifts, hospitality, and entertainment

Please refer to the Anti-Bribery & Anti-Corruption Policy.

All questions regarding this policy should be directed to the Compliance Officer.

5. Compliance and Audit

On an annual basis the Compliance Officer may monitor compliance with this policy, this may include a review of the completed Declaration of Compliance forms.

Schedule One – Declaration of Compliance:
BUSINESS, ETHICS, & INTEGRITY POLICY

All consultants, contractors and subcontractors should read the Collen Business Ethics & Integrity Policy and complete this declaration.

I, the undersigned*, acknowledge receipt of the Collen Construction Business Ethics & Integrity Policy and agree to follow the rules and principles set out in the policy. I will inform the Collen Construction Compliance Officer of any changes or decisions to change or deviation from this:

Name:	
Position:	
Company:	
Date:	

**the individual signing has authority to sign on behalf of the named consultant, contractor or sub-contractor.*

Signed Declarations should be returned to the Project Quantity Surveyor or Project Commercial Lead for Collen.

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ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Version 01

Approval Date: 01 October 2024

collen

Version	Document No	Document Title	Reviewed by (Owner)	Approved By	Date of Approval
01	CCGL24.1.1	Anti-Bribery & Anti-Corruption Policy	Legal and Compliance Dept.	EMT	01 Oct 2024

Revision History

Version	Date	Change Description
01	27.02.25	First release

Classification code: Please select as required:

Internal	<input type="checkbox"/>
External and Internal	<input checked="" type="checkbox"/>

ANTI- BRIBERY & ANTI-CORRUPTION POLICY

1. Introduction

- 1.1 Collen (the “Company” or “we”) is committed to conducting all aspects of its business in keeping with the highest legal and ethical standards and expects all employees and other persons acting on its behalf to uphold this commitment.
- 1.2 You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, contractor, sub-contractor, director, officer, worker, consultant, volunteer, supplier or service provider.
- 1.3 In brief, the Company will not tolerate bribery, kickbacks, or corruption of any kind, directly or through third parties, whether or not explicitly prohibited by this policy or by law. You are not permitted to give or offer anything of value (including gifts, hospitality, or entertainment) to anyone for the purpose of obtaining or retaining a business advantage other than in line with this policy. Similarly, you may not solicit or accept such improper payments other than in line with this policy.
- 1.4 This policy is to be read in conjunction with the Business, Ethics, & Integrity Policy, and any other relevant policies.
- 1.5 This policy and the internal controls herein have been designed to prevent bribery from occurring, avoid the appearance of wrongdoing and enable the Company to respond promptly and effectively to any inquiries about its conduct. Any employee who violates this policy may be subject to disciplinary action, up to and including termination. The pages that follow provide a general guide to anti-corruption compliance but do not address every potential scenario that may implicate this policy.
- 1.6 If you who have any questions concerning the requirements of this policy or to report any known or suspected violations should consult with the Compliance Officer of Collen (the “**Compliance Officer**”). The Compliance Officer has responsibility for administering the policy.
- 1.7 If you are an employee, this policy does not form part of your employment contract, and we may update it at any time. You remain required to comply with this and all policies of the Company as amended from time to time.

2. Overview of Irish law on bribery and corruption

- 2.1 Generally, the Irish Criminal Justice (Corruption Offences) Act 2018 (the “**CJA 2018**”) covers acts that take place in Ireland or that are carried out by Irish corporates, nationals, citizens and certain defined public officials outside of Ireland provided that the act is also an offence in the place where it is carried out.

- 2.2 The CJA 2018 prohibits corruption in both the public and the private sectors and contains a number of bribery and other corruption offences, including the following:
- (a) **Actively bribing:** corruptly offering, giving or agreeing to give a gift, consideration or advantage to a person as an inducement to, or reward for, or otherwise on account of, any person doing an act in relation to his or her office, employment, position or business.
 - (b) **Taking a bribe:** corruptly requesting, accepting, obtaining or agreeing to accept a gift, consideration or advantage as an inducement to, or reward for, or otherwise on account of, any person doing an act in relation to his or her office, employment, position or business
 - (c) **Active trading in influence:** corruptly offering or giving, directly or indirectly, anything of value to induce another person to exert an improper influence over an act of a public official in relation to the public official's office, employment, position or business.
 - (d) **Passive trading in influence:** corruptly requesting or accepting, either directly or indirectly, anything of value on account of a person promising or asserting the ability to improperly influence a public official to do an act in relation to the public official's office, employment, position or business.
 - (e) **Facilitating corruption:** giving anything of value, directly or indirectly, to another person in circumstances where the person giving the thing of value knows or ought reasonably to know that it will be used to facilitate the commission of a bribery or corruption offence.
 - (f) **Creating or using a false document:** creating or using a document, either directly or indirectly, while knowing or believing that the document contains a statement that is false or misleading in a material particular, with the intention of inducing another person to do an act in relation to his or her office, employment, position or business to the prejudice of any person.
 - (g) **Intimidation:** threatening harm to another person, either directly or indirectly, with the intention of corruptly influencing that person or another person to do an act in relation to the relevant person's office, employment, position or business.

3. Our Policy

3.1 Bribes

Giving or receiving bribes is strictly prohibited.

You must conduct your activities in full compliance with this policy, the laws of the European Union and all applicable anti-corruption laws, including all applicable Irish laws including the CJA 2018.

Under this policy, employees are not permitted to give or offer anything of value, directly or indirectly, to any person or any commercial entity for the purpose of improperly obtaining or retaining a business.

advantage. "Anything of value" should be broadly interpreted to include cash, gifts to family members, forgiveness of a debt, loans, personal favours, entertainment, meals and travel, political and charitable contributions, and business opportunities, among other items, favours or undertakings.

Simply put, bribes, kickbacks or similar payments are never permitted, whether made to customers, investors, clients, or other public or private parties. Similarly, you may not solicit or accept such payments.

If confronted with a request or demand for an improper payment or other violation of this policy, the request or demand must be immediately reported to your supervisor or line manager. Similarly, if any employee or agent knows or believes that an improper payment has been or will be made, the employee or agent must also report such payment to their supervisor or line manager. The Company's policy is that no adverse employment action will be taken against any personnel in retaliation for, honestly and in good faith, reporting a violation or suspected violation of anti-corruption laws or this policy, even if that report turns out to be mistaken.

3.2 Gifts

Gifts are only permitted if they are of nominal value, such as advertising trinkets bearing a company logo: hats, t-shirts, pens and the like. Any other types of gifts are normally not permitted. Advance approval to give or receive gifts in excess of nominal value may be obtained from the senior management team with business or functional reporting line responsibility for the employee requesting approval.

All gifts whether they are given or received by Collen, should be recorded in the gift register, which is retained by the Compliance officer. Details should be provided by email to: Compliance@collen.com {include given / received, description of gift, name of recipient or provider, whether the gift was accepted, reason for accepting and name of approver (if required)}.

Gifts are not permitted to be bestowed unless **all** of the following circumstances are met.

- (a) the gift does not involve cash or cash equivalent gifts (e.g., gift cards, store cards, or gambling chips).
- (b) the gift is permitted under both local law and the guidelines of the recipient's employer.
- (c) the gift is presented openly with complete transparency.
- (d) the gift is properly recorded.
- (e) the gift is provided as a token of esteem, courtesy, or in return for hospitality and should comport with local custom; and
- (f) the item costs less than €200.

Gifts that do not fall specifically within the above guidelines require advance consultation and approval by the appropriate Director.

Note that the provision of gifts, as well as the reporting requirements, in this policy, apply even if you are not seeking reimbursement for the expenses (i.e. paying these expenses out of your own pocket does not avoid these requirements).

You must not accept or permit any member of your immediate family to accept any gifts, gratuities, or other favours from any customer, supplier, or other person doing or seeking to do business with the Company, other than items of nominal value. Any gifts that are not of nominal value should be returned immediately and reported to Compliance Officer (who will, if deemed appropriate, consult with counsel to the Company and/or escalate matters to the Board).

3.3 Meals, Entertainment, Travel, and Lodging

Business Travel and Expenses should be in line with the Collen Business Travel and Expenses policy and hospitality must be reasonable, must be for a business purpose, and must not be so frequent as to suggest a pattern. Hospitality can include such items as occasional business meals and beverages, or transportation to or from a business function.

Common sense and moderation should prevail in business entertainment and the payment of travel, and lodging expenses engaged in on behalf of the Company. You should provide business entertainment to someone doing business with the Company only if the entertainment is infrequent, modest, and intended to serve legitimate business goals.

Meals, entertainment, travel, and lodging should never be offered as a means of influencing another person's business decision. Each should only be offered if it is appropriate, reasonable for promotional purposes, offered or accepted in the normal course of an existing business relationship. The appropriateness of a particular type of entertainment, travel, and lodging of course, depends upon both the reasonableness of the expense and on the type of activity involved. This is determined based on whether or not the expenditure is sensible and proportionate to the nature of the individual involved. "Adult" entertainment is strictly prohibited.

Expenses for meals, entertainment, travel, and lodging for any individual or entity (in the private or public sector) that has the power to decide or influence the Company's commercial activities may be incurred without prior approval by the appropriate Director only if **all** of the following conditions are met:

- (a) The expenses are bona fide and related to a legitimate business purpose and the events involved are attended by appropriate Collen representatives.
- (b) The cost of the meal, entertainment, travel, or lodging is less than €200 per person; and
- (c) The meal, entertainment, travel, or lodging is permitted by local law and the rules of the recipient's employer (if applicable).

For all such expenses, the reimbursement request must identify the total number of all attendees and their names, employer, and titles (if possible). All expense reimbursements must be supported by receipts, and expenses and approvals must be accurately and completely recorded in the Company's records. In all instances, you must ensure that the recording of the expenditure associated with meals, lodging, travel, or entertainment clearly reflects the true purpose of the expenditure.

Note that the provision of meals, entertainment, travel, and lodging as well as the reporting requirements, in this policy, apply even if you are not seeking reimbursement for the expenses (i.e. paying these expenses out of your own pocket does not avoid these requirements).

When possible, meals, entertainment, travel, and lodging payments should be made directly by the Company to the provider of the service and should not be paid directly as a reimbursement.

Any meal, entertainment, travel, or lodging expense greater than €200 per person, and any expense at all that is incurred for meals, entertainment, travel, or lodging unrelated to a legitimate business purpose, must be pre-approved by the appropriate Director.

Please note that in addition to traditional gifts, meals, entertainment, and travel that are provided to business relationships where you are not in attendance shall be considered gifts, and subject to the rules and requirements for gifts specified in this policy.

4. Relationships with third parties

- 4.1 You should discuss the engagement of any third parties with the appropriate Director. The appropriate Director is responsible for taking reasonable precautions to ensure that the third parties conduct business ethically and comply with this policy and all applicable laws including health and safety and anti-money laundering procedures more particularly set out in Collen's Anti-Money Laundering Policy.
- 4.2 Any employee retaining third parties that will be representing the Company as an agent or supply or services providers or otherwise must engage the third party through a written contract that specifies in reasonable detail the services to be provided and receive approval of the engagement from the appropriate Director prior to hiring the third party.
- 4.3 In addition, once a third party is engaged, any employee who deals with third parties must always be aware of potential red flags. Red flags are certain actions or facts which should alert you that there is a possibility of improper conduct by a third party. A red flag does not mean that something illegal has happened, but rather that further inquiry is necessary. Red flags are highly fact-dependent, but some examples of red flags are:
- Unusual or excessive payment requests, such as requests for over-invoicing, up-front payments, ill-defined or last-minute payments, success fees, unusual commissions, or mid-stream compensation payments.
 - Requests for payments to an account in a country other than where the third party is located or is working on behalf of the relevant Company entity.
 - Requests for payment to another third party, to a numbered account, or in cash or other untraceable funds.
 - Requests for political or charitable contributions.
 - Any refusal or hesitancy by the third party to disclose its owners, partners, or principals.
 - The third party uses holding companies or other methods to obscure its ownership, without adequate business justification.
 - The third party expresses a desire to keep his representation of the relevant Group Entity or the terms of his retention secret; or
 - The third party has little experience in the industry but claims to "know the right people."

- 4.4 If you have reason to suspect that a third party is engaging in potentially improper conduct, you shall immediately report the case to the Compliance Officer. An investigation will take place and no further payments to the third party will be made until such time that the investigation has been completed and a decision is made as to the best course forward.

5. Recordkeeping and internal controls

- 5.1 This policy requires that all expenditures made by you are accurately reflected in the Company's financial records and that all payments made with Company funds, or on behalf of the Company, have been properly authorised. You must follow all applicable standards, principles, laws, and practices for accounting and financial reporting. You must be timely and complete when preparing all reports and records required by management. In particular, you should ensure that no part of any payment is to be made for any purpose other than that to be fully and accurately described in the books and records. You should use best efforts to ensure that all transactions, dispositions, and payments involving Company funds or assets are properly and accurately recorded in the Company's financial records. No undisclosed or unrecorded accounts are to be established for any purpose. False or artificial entries are not to be made in the books and records for any reason.

6. Compliance Procedures and Training

- 6.1 As part of the Company's ongoing commitment to anti-corruption compliance, all directors, officers and employees receive and must review a copy of this policy.
- 6.2 In addition, the Company will offer periodic anti-corruption compliance training programs to educate employees about the requirements and obligations of anti-corruption laws and this Policy. All employees of the Company must participate in such training.

7. Reporting requirements and whistleblower protection

- 7.1 The Group takes its commitment to anti-corruption compliance very seriously and expects all Company personnel to share this commitment.
- 7.2 Please refer to the Protected Disclosure Policy if you have knowledge of, or reason to suspect that there is a violation of this policy is taking place.

All questions regarding this policy should be directed to the Compliance Officer.

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ANTI-MONEY LAUNDERING POLICY

Version 01

Approval Date: 13 February 2025

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Version	Document No	Document Title	Reviewed by (Owner)	Approved By	Date of Approval
01	CCGL24.1.7	Anti-Money Laundering	Legal and Compliance Department	EMT	13 Feb 2025

Revision History

Version	Date	Change Description
01	27.02.25	First release

Classification code: Please select as required:

Internal	<input type="checkbox"/>
External and Internal	<input checked="" type="checkbox"/>

ANTI-MONEY LAUNDERING POLICY

1. Introduction

Collen (the “Company” or “we”) aim to comply with all applicable Anti-Money Laundering (AML) laws in the jurisdictions we operate. To this end, Collen will only conduct business with customers who are involved in legitimate business activity and whose funds are derived from legitimate sources.

2. Purpose

The purpose of this Anti-Money Laundering Policy is to explain the rules you are required to follow to reduce the risk of money laundering and terrorist financing associated with Collen. This policy explains our individual responsibility in complying with anti-money laundering and counter terrorist financing laws in the jurisdictions in which we operate. This policy will apply to all jurisdictions.

3. Application

This policy is mandatory for Collen, its subsidiaries and associated companies including joint ventures and covers all activities carried out by Collen, it applies to employees, contractors, sub-contractors, directors, officers, consultants, volunteers and suppliers and anyone else acting on Collen’s behalf in any jurisdiction.

Where local customs, standards, laws, or other policies apply that are stricter than the provisions of this policy, the stricter requirements must be complied with. However, if this policy stipulates stricter requirements than local customs, standards, laws or other local policies, the stricter provisions of this policy shall apply.

4. Policy Violation and Disciplinary Action

Failure to comply with this policy can have severe consequences. For the Company, these could include significant monetary penalties, exclusion from contracting with clients or public entities, criminal fine and or prosecution, damages claims and or significant reputational damage. Individuals could face prosecution, criminal fines and imprisonment.

Collen will view any violation of this policy by an employee as a significant matter subject to disciplinary action, including termination of employment.

Collen reserves its right to terminate its contractual relationships with any contractor, sub-contractor, consultant, volunteer, supplier or other third parties that breach this policy.

5. Requirements

5.1 What is the risk?

Breaches of AML laws may lead to severe criminal or civil penalties for companies and individuals, including significant monetary fines, imprisonment, extradition, blacklisting, revocation of licences, and disqualification of directors.

In addition, breaches of AML laws can lead to harm to reputation and commercial relationships, restrictions in the way we can do business, and time and cost to conduct internal investigations and/or defend against government investigations and enforcement actions.

5.2 What is Money Laundering and Terrorist Financing?

Money laundering means exchanging money or assets that were obtained criminally for “clean” money or other assets that don’t have an obvious link with any criminal activity. AML laws also prohibit money being used to fund terrorism, whether it has been obtained legitimately or not.

The following types of activities are considered to be “money laundering” and are prohibited under this policy:

- the conversion or transfer of property (including money), knowing or suspecting that such property is derived from criminal or certain specified unlawful activity ("criminal property"), for the purpose of concealing or disguising the illicit origin of the property, or of assisting any person who is involved in the commission of such activity to evade the legal consequences of his action;
- conducting a financial transaction which involves criminal property;
- the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, ownership or control of criminal property;
- the acquisition, possession or use of criminal property;
- promoting the carrying on of unlawful activity; and
- participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counselling the commission of any of the actions mentioned above.

The broad definition of money laundering means that anybody (including any employee, contractor, sub-contractor, director, officer, consultant, volunteer or supplier) could be in violation of AML laws if he/she becomes aware of, or suspects the existence of criminal property within the business and becomes involved in, or continues to be involved in, a matter which relates to that property being linked to the business without reporting his/her concerns.

Property can be criminal property where it derives from any criminal conduct, whether the underlying criminal conduct has taken place in the country where you are situated or elsewhere.

Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal the origin or intended use of the funds, which will later be used to fund terrorist activity.

5.3 Red Flags

Where any suspicions arise, that criminal conduct may have taken place involving an employee, contractor, sub-contractor, director, officer, consultant, volunteer or supplier, you should consider whether there is a risk that money laundering or terrorist financing has occurred or may occur.

Some examples of red flags to be reported include but are not limited to:

- A customer, sub-contractor, consultant or supplier provides insufficient, implausible or false information or is reluctant to provide complete information regarding ownership structure.
- The business formation documents from a customer, sub-contractor, consultant or supplier are from a tax haven, or a country that poses a high risk for money laundering, terrorism or terrorist financing, or a country that is not otherwise associated with the customer.

- Methods or volumes of payment are seen that are not customarily used in the course of business, e.g., payments with money orders and/or multiple instruments to pay a single invoice, and/or payments from unrelated third parties.
- Requests by a customer, sub-contractor, consultant or supplier to pay in cash.
- Orders or purchases that are inconsistent with the trade or business of the customer, sub-contractor, consultant or supplier.
- Payments to or from third parties that have no apparent or logical connection with the customer, sub-contractor, consultant or supplier or the related transaction.
- Payment to or from countries considered high risk for money laundering or terrorist financing, or from countries unrelated to the transaction or the known location of the customer, sub-contractor, consultant or supplier.
- Overpayments followed by directions to refund a payment, especially if requested to send the payment to a third party.
- Structuring transactions to avoid government reporting or record keeping requirements.
- Wire transfer or other payment activity that is not consistent with the business activities of the customer, sub-contractor, consultant or supplier, or which originates or terminates with parties unrelated to the transaction.

The above is not intended to be an exhaustive list and any unexplained deviation from accepted business practice should alert you to further investigate the activity in accordance with this policy.

5.4 Employee Responsibility

All employees, contractors, sub-contractors, directors, officers, consultants, volunteers and suppliers are required to read and follow this policy, to understand and identify any red flags that may arise in their business activities and to escalate potential compliance concerns related to this policy with the appropriate director without notifying anyone involved in the transaction.

If a concern is raised, no further action should be taken before advice and/or instructions from Collen's Executive Management Team.

6. Due Diligence and Record keeping

It is our policy to carry out due diligence at the outset on any contractor, sub-contractor, consultant, supplier, or any person with whom an established business relationship may arise with Collen, and which will involve the transfer to or receipt of funds. Collen need to ensure they are satisfied that they are who they say they are and that they can ensure that there are no legal barriers to working with these parties before contracts are signed or transactions occur. Various factors will determine the appropriate forms and levels of screening.

You should escalate any instances where you have cause for suspicion as a result of carrying out due diligence and ongoing monitoring to the appropriate director, who will advise you regarding next steps.

You must, in consultation with Collen's Executive Management Team, carefully consider the outcome of those next steps before deciding whether to do business with the above parties.

Collen's Finance Department will regularly monitor and review activities which could indicate that money laundering or terrorist financing is taking place and maintain records to evidence the due diligence and ongoing monitoring undertaken.

7. Training and Communication

Training on this policy will be delivered on a yearly basis and all employees will receive online training on how to identify money laundering, the consequences of engaging in money laundering and how to report money laundering in accordance with this policy.

8. Raising a concern

If you are in doubt about whether something constitutes money laundering, or have any questions in relation to this policy, please consult with the Compliance Officer at Compliance@collen.com for further guidance.

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