



RESPONSIBLE BUSINESS CONDUCT

At ALFA Development, we aim to act responsibly in all respects – both in our day-to-day operations and in our construction and development projects. We therefore recognise international principles and guidelines for responsible business conduct within social and governance matters.

Our policies and processes are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs) to ensure alignment with prevailing international expectations. These two frameworks provide us with a structured basis for the implementation and management of responsible business conduct.

Our Commitment

ALFA Development is committed to respecting internationally recognised human rights and labour rights, including:

- The Universal Declaration of Human Rights (UDHR)
- The ILO Declaration on Fundamental Principles and Rights at Work, including respect for freedom of association and the right to collective bargaining, the elimination of forced labour and child labour, and the elimination of discrimination in respect of employment and occupation

We have adopted policies and processes designed to prevent violations of these rights and commit to ensuring access to remedy should adverse impacts occur.

Due Diligence Commitment

Based on the UNGPs and the OECD's six-step due diligence model, we are committed to working systematically with social and governance matters. This means that, in our projects and daily operations, we have implemented due diligence processes to support key aspects of our sustainability efforts.

We continuously identify actual and potential adverse impacts and assess their likelihood and severity. This enables us to prioritise and address the most significant risks. We actively seek to prevent adverse impacts, avoid recurrence, and provide remediation where we cause or contribute to such impacts. Furthermore, we measure the effectiveness of our processes and communicate externally to ensure transparency.

We have established a grievance mechanism that is accessible to all.

Where necessary, we prioritise mitigating actions using a risk-based approach.



Employees

We expect our employees to actively engage in respecting human rights. This means that employees must inform ALFA Development if they identify that the company has negative human rights impacts, whether directly or indirectly.

To strengthen and continuously improve our human rights efforts, we provide ongoing human rights training. We also continuously inform employees about our policies on anti-corruption, fair competition, and tax matters, and maintain ongoing dialogue with relevant external stakeholders to ensure continuous improvement of our practices.

Business Partners

Our expectations of business partners mirror those we have of our employees: that they act responsibly. We also expect business partners to impose equivalent requirements on their own business relationships.

If business partners identify adverse impacts that they cause or contribute to, we expect to be informed so that we can act and support remediation in cases involving violations of fundamental labour rights.

Anchoring and Accessibility

Our commitment to responsible business conduct is expressed through a range of policies.

For a full overview of policies and grievance mechanisms, please refer to ALFA Development's website: www.alfadev.dk/politikker.

This policy has been approved by ALFA Development's senior management. Responsible business conduct is integrated into both our governance structure and our interactions with business partners across our value chains.

The policy is publicly available on our website and is actively communicated to employees and business relationships. It is reviewed and updated annually.

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