

This document is a translation made by SHK of the original response in Swedish to the safety recommendation. In case of discrepancies between this translation and the Swedish original text, the Swedish text shall prevail in the interpretation of the response.

NCC's actions following the Swedish Accident Investigation Authority's recommendations in case O-1/24

The Swedish Accident Investigation Authority (SHK) has undertaken an extensive effort that has charted the sequence of events at Oceana and there are lessons to learn for both NCC and others.

As one of the leading construction and civil engineering companies in the Nordic region, NCC has extensive procedures, systems and aids for health and safety on our construction sites. Safe workplaces are one of NCC's highest priorities and the group has, as well as financial targets, targets for health and safety and climate and energy.

NCC's culture is based on NCC's values and four value behaviours NCC calls Star Behaviours. In the behaviour called "Act with consideration", "I work safely or not at all" and "I never compromise on safety" are fundamental components.

NCC's values and behaviours, and thereby also a focus on safety culture, permeate the entire employee cycle. The behaviours are contained in, among other things, processes such as induction days for new members of staff, e-learning for members of staff/managers, performance appraisals, including managers appraisals of staff members' behavioural compliance, questions in staff surveys and as part of succession planning, etc.

Actions taken

SHK recommended that NCC take action in its role as general contractor **to enhance monitoring and follow-up of compliance with established rules and procedures** relating to safety. This action should include the promotion and maintenance of a good safety culture. NCC takes the safety recommendations very seriously and has for reasons including these recommendations implemented the improvements described below. We make the assessment that these measures are a good response to SHK's recommendations and that they contribute to a safer work environment.

Improvements prior to the start of production

- Enhanced scrutiny of work environment issues before a project is given permission to start its production. The scrutiny helps the project to ensure a good level of planning for the work environment management during the production phase.

Improvements during the production phase

- Regular monitoring of compliance with the rules is part of the day-to-day work in a construction project. In addition to this, safety inspections are an important component of monitoring. NCC has:
 - a. clarified existing procedures for safety inspections. Checks of ID06 are already taking place, among other things within the scope of existing procedures for safety inspections. The procedures for safety inspections are now being developed so that checks of ID06 become their own inspection area at the level of, for example, General Order, Barriers or Fire Safety. The aim of the measures is to further clarify checks on ID06 through safety inspections.
 - b. updated procedures for targeted safety inspections. A targeted safety inspection is a safety inspection that focuses on specific areas or risks in the work environment. NCC has produced a new checklist for targeted safety inspections for verifying identity, that the individual has undergone mandatory training in order to access the workplace and has the right qualifications for their duties.
 - c. made the existing consequences procedure more stringent and clearer. The procedure for consequences in the event of violations of NCC's work or safety regulations is being enhanced through NCC *shall*, instead of *may*, deny external persons, as it does with its own staff, entry to the workplace in the event of repeated offences.
- NCC has been using the IT system Synergi for a long time as a tool for systematic exception reporting. This is an important part of systematic work environment management where positive and negative observations, incidents and accidents involving health and safety are reported in order to then be used in the improvement process. NCC has recently added a new follow-up procedure in the event of serious incidents and accidents, which involves implementing mandatory follow-up meetings in order to ensure that all the parties involved are aware of what happened and what action needs to be taken to further contribute to ensuring that lessons are learned.

Improvements at Oceana during the reconstruction works

A number of measures that serve as examples for other projects have also been implemented at Oceana. Examples of measures for making it even easier for staff on the construction site to do the right thing are:

- manned guard and turnstiles that allow only one person at a time to pass through the staff entrance on the work site. Registration takes place automatically here.
- manned guard at the vehicle entrance in order to prevent people driving in without registering.
- no longer possible for members of staff to open doors and gates for others.

ID06 checks, with an external party, were conducted at the end of March and showed 100% compliance.

External acknowledgment of NCC's systematic work environment management

Since spring 2025 the whole of NCC's Swedish construction business is certified in accordance with ISO 45001. This means that an independent party has reviewed the business and verified through the certification that NCC's work environment management is being conducted in a systematic manner.

Summary

We make the assessment that these measures are a good response to SHK's recommendations and that they contribute to a safer work environment. At the same time, NCC will continue to develop working methods and procedures in order to maintain all aspects of the safety culture. With the lessons learned from Oceana and a long-term commitment to health and safety, we strive to create safe workplaces – every day in every project.