

## Introduction to Strandmøllen's Code of Conduct

Strandmøllen has been owned by a foundation since 1967. That means the company has a solid, long-term and financially consolidated owner. Strandmøllen's founder, Christian Nielsen, and his vision have been motivational for us to continue his work growing our business sustainably, to the benefit of customers and employees.

The pillars of Strandmøllen AB's Code of Conduct are our six basic beliefs:

- We are good colleagues
- We deliver on time
- We give good, honest advice
- We work safely
- We make quality products
- We work cost-effectively

### Strandmøllen's Code of Conduct

Strandmøllen's Code of Conduct explains how our values should be put into practice. It should act as an ethical compass to be followed by all personnel. Strandmøllen's Code of Conduct applies in any business context, and to everyone working on Strandmøllen's behalf, whether they are full-time, part-time, consultants, temps, or senior management.

The Code of Conduct is part of the Strandmøllen's internal training programs for both new employees and those already working within the company. Managers must behave in such a way that they set an example in the application of the code.

As an employee, you are responsible for following Strandmøllen's Code of Conduct and the guidelines set out in the Employee Handbook, as failure to do so can have severe consequences for you, and for Strandmøllen. If you find that Strandmøllen's Code of Conduct or our basic beliefs do not provide adequate guidance in a given situation, ask yourself the following four questions:

- Is it illegal?
- Can it harm Strandmøllen's reputation?
- Is it unethical?
- Would I be embarrassed to read about it in the media?

If the answer is yes to any of those questions, stop work and contact your manager, who will be able to help you find a way to deal with the situation.

The code also sets out what we expect of our business partners. The Code of Conduct provides guidance in eight different areas. Within a number of areas, the Code of Conduct is supplemented by more detailed policies, guidelines and management systems.

## **1. OBSERVING THE LAW**

Strandmöllen AB is obliged to comply with all relevant laws and regulations. We have a zero tolerance approach to breaches of key areas of the Code of Conduct. This applies, for example, to compliance with legislation, the application of human rights and issues such as bribery, corruption and competition law. In other areas, we work systematically and purposefully with continuous improvements.

## **2. HUMAN RIGHTS AND WORKING CONDITIONS**

### **2.1 Mutual influence, respect and trust**

We respect the personal dignity, privacy and personal rights of every individual. According to our corporate values, we are obliged to show respect, honesty and trust towards our employees and external partners. We appreciate fair, friendly and constructive behavior in our professional relationships and we do not harass, threaten or discredit each other.

### **2.2 Equality and equal treatment**

Our culture advocates equal opportunities and appreciation of all our employees. We do not accept discrimination with regards to gender, religion, age, disability, sexual orientation, nationality, political views, social background or ethnic origin under any circumstances. In decisions concerning employment, they are always treated according to their abilities and qualifications. We value and take initiative to develop diversity among our employees.

### **2.3 Forced labour and child labour**

Strandmöllen AB forbids illegal labour and avoids all forms of forced labour, and guarantees that no one will be employed against their will. Any form of child labour is forbidden. If local laws do not stipulate a higher age, no child of school age (0-9th grade) or under the age of 15 should be employed by Strandmöllen AB.

### **2.4 Safe working Environment**

Strandmöllen AB ensures a safe, ergonomic working environment for its employees and is responsible for preventive measures with regard to occupational health and safety. Applicable requirements for occupational health and safety are fulfilled and a working environment that underpins health is provided to all employees. We take preventative measures to reduce the risk of accidents and work injuries and occupational disease.

### **2.5 Pay and working hours**

Strandmöllen offer fair wages and benefits to its employees, which are in agreement with regulations, such as lawful working hours, minimum wages levels and vacation.

### **2.6 Opportunities for personal development.**

Strandmöllen strives to create good relations with our employees and expect involvement in the company's development. We strive for an organization where employees, based on our principles, can work independently and are confident in making their own decisions. Employees are offered opportunities to develop their professional skills and abilities

## 2.7 Freedom of Association and Collective Bargaining

We respect the right of all employees to organize and negotiate a collective agreement. We also respect the right of an employee to refuse to join a union.

## 3. CORPORATE INTEGRITY

### 3.1 Business ethics, bribery and corruption

Strandmøllen make demands for honesty and integrity in all parts of its operations and expects the same from our external partners. Free, fair competition is the cornerstone of economic activity. Corruption, disloyalty and fraud distort that competition. We particularly expect our employees to refrain from offering, promising or permitting any form of advantage to the employees of customers, suppliers or associated third parties, for the purpose of receiving an order or any other form of preferential treatment. Any form of contribution offered to the employees of customers or suppliers and to public servants or the employees of other companies for the purpose of winning an order or obtaining other benefits for Strandmøllen or anyone else, including themselves, is totally unacceptable.

### 3.2 Gifts and invitations

Our business relationships are based on honesty and cannot be distorted or influenced by any form of bribery or the like. Invitations, gifts or hospitality offered by Strandmøllen's employees must be justifiable and legitimate. We avoid situations in which company loyalty could come into conflict with personal interests. When in doubt, the employee must refer to his or her superior to decide if planned transaction constitutes a conflict of interest or not.

### 3.3 Whistleblowing and anti-retaliation

Strandmøllen's employees are obliged to immediately notify the management group if they either see or suspect inappropriate and improper conduct in terms of unethical business practices, human rights violations or infringement of environmental regulations by a supplier, sub-supplier or their colleagues at Strandmøllen. We ensure that all employees can raise concerns about irregularities, without the risk of negative personal consequences for whistleblowers. . Complaints and concerns can be communicated via:

Mobile: +45 40 38 45 20

Email: [whistleblower@strandmollen.dk](mailto:whistleblower@strandmollen.dk)

Mail: Christian Niensens Fond, Strandvejen 895,  
DK-2930 Klampenborg.  
Att.: Anne Christine Helms  
Tag: Confidential

### 3.4 Local community integration

Strandmøllen strive to get involved in the local communities where we have operations and aim to appoint and develop local employees and managers. We participate actively in projects and cooperation with industrial networks, schools, universities and research institutes. We prioritize the support and sponsorship of organizations that share our values and that benefit the societies in which we operate. We therefore prioritize associations and organizations that are engaged in matters of great value to our employees and their families.

### 3.5 Anti-Corruption and money laundering

Strandmöllen is obliged to comply with all relevant laws on fair competition and anti-monopoly law. Strandmöllen may not breach the anti-monopoly laws in agreements for, e.g., illegal pricing, allotment of market share and customers, market agreements or fraud with incentive. Strandmöllen is obliged to establish orderly financial records and transactions, and to comply with all relevant legal obligations concerning the prevention of money laundering, and may not become involved in money laundering.

### 3.6 Counterfeit prevention

Strandmöllen holds up a strict policy against counterfeit goods and helps in guarding the supply chain against their entry. Our counterfeit prevention policy is based on having a secure supply chain, batch traceability and avoiding grey market transactions. By collaborating with approved suppliers for purchases of raw materials & components and package-tracking enables us to prevent counterfeit parts in our operations.

## 4. DATA PROCESSING

Strandmöllen must follow the data protection laws and regulations in force. Personal data on customers, consumers and employees must be processed in strict confidentiality. Strandmöllen must protect confidential data and only use it in a suitable manner. Strandmöllen does not have the right to disclose information that is not in the public domain.

## 5. ENVIRONMENT PROTECTION

Strandmöllen is obliged to follow the environmental laws and regulations in force, develop ways of minimizing environmental pollution and improve methods of environmental protection. Strandmöllen is expected to establish and implement a suitable environmental management system. We work hard to reduce the company's environmental impact and thus contribute to the change to a more sustainable society. We are obligated to conserve energy, water and materials and other natural resources and aim to increase our use of renewable materials. Environmental and health factors are taken into account when choosing raw materials, chemical products and distribution methods.

Strandmöllen carries out its operations in accordance with the ISO 14001 environmental management standards and we operate with pertinence to all the national and international regulations put forward for the protection of forest, land and water bodies. We have emergency preparedness by systematically identifying and evaluating the risk of accidents, fires and uncontrolled emissions. We use our expertise to provide eco-optimization of customer's products. We disclose transparent and objective information about our environmental work to our employees, the public and authorities.

## 6. CONFLICT MINERALS

Strandmöllen is responsible for precautions against the use of products that directly or indirectly finance armed groups, or the violation of human rights. Should such a product contain one or more of the following 'conflict minerals' – tin, tantalum, tungsten, gold or their ores – we guarantee transparency with regard to our entire supplier chain upon request. Furthermore, Strandmöllen strictly adhere to regulations that control the usage of public and private security forces and we follow all relevant national and international laws that protect the rights of indigenous communities and minorities.

## 7. SUPPLY CHAIN

Strandmøllen expects its employees to forward “STRANDMØLLEN’S CODE OF CONDUCT: SUPPLIERS” including all its principles and requirements to their suppliers and sub-suppliers, and that it be used as a selection criterion (a copy of “STRANDMØLLEN’S CODE OF CONDUCT: SUPPLIERS” can also be found on our intranet).

## 8. FAILURE TO COMPLY

Any failure to comply with the obligations set out in Strandmøllen’s Code of Conduct will be regarded as a fundamental breach of contract. If there is any suspicion of failure to comply with the principles, Strandmøllen reserves the right to request additional information concerning the case in question. If improvements are not implemented within a given deadline, or if Strandmøllen’s Code of Conduct is not followed, Strandmøllen reserves the right to terminate the contract.