

## **STRANDMØLLEN'S SUPPLIER 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.

We want to achieve success through fair competition and ethical & legal behavior. A credible business relationship that will benefit everybody can only exist if there is fair competition and it is fully compliant with the law. All collaboration at Strandmøllen between colleagues and with external partners is characterized by security, trust, reliability and honesty. To be able to retain the trust and confidence of our customers, employees and the public authorities, it's vital that we always conduct ourselves with respect for justice and the law, and follow our own internal regulations.

We are aware of our responsibility to our customers, employees and organizations, and we therefore set out ethical, social and legal guidelines and principles in this Supplier Code of Conduct, to be able to maintain our successful collaboration. Hence, Strandmøllen's Code of Conduct defines the general principles and requirements applicable to Strandmøllen suppliers and other external partners.

Procedures, accountability and technology are very important to us. The same applies to social and ecological aspects, such as human rights, working conditions, prevention of corruption and protecting the environment.

### **1. OBSERVING THE LAW**

Strandmøllen's suppliers must always comply with all and any applicable national laws and regulations, including but not limited to any applicable regulatory requirements. It is the responsibility of each individual supplier to stay informed about applicable legislation.

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

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

We at Strandmøllen 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 to our employees and external partners. We appreciate fair, friendly and constructive behavior in our professional relationships, and expect the same of our suppliers and other external partners.

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

Strandmøllen expects its suppliers to have our shared values regarding equal opportunities and appreciation of all their employees. Discrimination or harassment with regard to ethnicity, nationality, gender, age, religion, ideology, handicap or sexual orientation under any circumstances is to be forbidden. Employees are to be treated justly according to their abilities and qualifications in all decisions concerning recruitment and employment.

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

Strandmöllen's suppliers strictly forbid all forms of forced labour, and guarantee that no one will be employed against their will. Any form of child labour is also forbidden. If the local law do not stipulate a higher age, no child of school age (0-9th grade) or under the age of 15 should be employed.

### **2.4 Safety at work**

Strandmöllen's suppliers must ensure a safe, ergonomic working environment and are responsible for preventive measures with regard to occupational health and safety. Applicable requirements for occupational health and safety must be fulfilled. A working environment that underpins health must be provided, while occupational injuries must be avoided.

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

Strandmöllen expects its suppliers to compensate their employees with fair wages and benefits that are in agreement with regulations, such as lawful working hours, minimum wage levels and vacations.

### **2.6 Freedom of assembly and association**

Strandmöllen's suppliers must respect the right to union and to negotiate collectively. Employee representatives must be free to express their concerns, especially regarding working conditions.

## **3. CORPORATE INTEGRITY**

### **3.1 Bribery and corruption**

Free, fair competition is the cornerstone of economic activity. Corruption, disloyalty and fraud distort that competition. Strandmöllen particularly expect our suppliers to refrain from offering, promising or permitting any form of advantage to the employees of Strandmöllen 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 Strandmöllen or anyone else, including themselves, is totally unacceptable.

### **3.2 Conflict of Interest**

Suppliers must not to be influenced in their business decisions by an individual's personal interests or relationships to decision-makers. All business relationships must be based on honesty and should not be distorted or influenced by any form of bribery or the like.

### **3.3 Identification of cases and Whistleblowing**

Suppliers must immediately notify Strandmöllen if they either see or suspect inappropriate and improper conduct by a supplier, sub-supplier or the employees of Strandmöllen. It should be ensured that all employees and other interested parties can raise concerns about irregularities, without the risk of negative personal consequences for whistleblowing. 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 Free competition**

Suppliers are obliged to comply with all relevant laws on fair competition and anti-trust laws. Suppliers may not breach the anti-trust laws in agreements for, e.g. illegal pricing, allotment of market share and customers, market agreements or fraud with incentives and, if they have a dominant position on the market, cannot abuse it.

### **3.5 Financial transparency and Money laundering**

Suppliers must comply with all relevant legal obligations concerning the prevention of money laundering, and may not become involved in money laundering.

### **3.6 Counterfeit prevention**

Strandmøllen holds up a strict policy against counterfeit goods and helps in guarding the supply chain against their entry. Thus, we urge our suppliers to share our values with respect to counterfeit prevention, which is based on having a secure supply chain, batch traceability and avoiding grey market transactions.

## **4. DATA PROCESSING**

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

## **5. ENVIRONMENT PROTECTION**

Strandmøllen's suppliers must always follow environmental laws and regulations in force, develop ways of minimizing environmental pollution and improve methods of decarbonization from operations.

### **5.1 Resource management**

Suppliers are obliged to observe sustainable resource management practices in terms of water, energy and raw material consumption. Recycling should be promoted and proper energy management should be set up and renewable energy sources are to be entertained. Process optimization must be maintained to improve resource efficiency and waste reduction.

### **5.2 Protecting the ecosystem**

Suppliers are expected to operate with pertinence to all national and international regulations put forward for the protection of forests, land and water bodies. Implement a suitable environmental management system that monitors the impact of their operation on flora & fauna.

### 5.3 Emission Control

Suppliers are obliged to follow all regulation that pertains to the appropriate disposal of waste materials and emissions of all nature. This includes setting up management systems that regulate the disposal of production byproducts, chemicals, waste water and greenhouse gases and track its environmental impact. Moreover, air, soil, water and noise pollution levels are to be monitored and confirmed to be below control levels.

## 6. CONFLICT MINERALS

Strandmøllen’s suppliers are 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 – Strandmøllen expects suppliers to guarantee transparency with regard to our entire supplier chain upon request.

Strandmøllen expects its suppliers to strictly adhere to all relevant national and international laws that protect the rights of indigenous communities and minorities that control the usage of public and private security forces.

## 7. SUPPLY CHAIN

Strandmøllen aims for a secure supply chain in its operation and expects its suppliers to forward “STRANDMÖLLEN’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.

## 8. FAILURE TO COMPLY

Any failure to comply with the obligations set out in “STRANDMÖLLEN’S CODE OF CONDUCT: SUPPLIERS” 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 this Code of Conduct is not followed, Strandmøllen reserves the right to terminate the contract

## 9. DECLARATION OF COMPLIANCE

The undersigned supplier hereby declares that the contents of “STRANDMÖLLEN’S CODE OF CONDUCT SUPPLIERS” are understood and accepted, and that the requirements referred to will be fully complied with. We are aware of all relevant laws and regulations in the countries where we operate.

Company name \_\_\_\_\_

CBR number \_\_\_\_\_

Name and title \_\_\_\_\_

Date \_\_\_\_\_

Signature \_\_\_\_\_

This document must be signed by an authorized representative of the supplier and returned to Strandmøllen