

Supplier Code of Conduct

1. Scope

This Supplier Code of Conduct applies to all suppliers, vendors, consultants, independent contractors, agents, or any other third party engaged to carry out any action on behalf of Thylander (“business partners”).

It is Thylander’s policy to comply with the highest standards of ethics and integrity. At Thylander, we manage our business in compliance with all the applicable laws and regulations of the countries we operate. In addition, we support the 10 principles of UN Global Compact regarding human rights, labour standards, environment and anti-corruption. We expect our own employees as well as business partners to act in accordance with these principles.

This Supplier Code of Conduct is provided to business partners of Thylander and as a general rule referenced in Thylander’s contracts with business partners.

If this Supplier Code of Conduct is breached by one of Thylander’s business partners, we expect the supplier to work in good faith to remedy the breach and inform Thylander.

2. Anti-trust and competition laws

Thylander is committed to complying fully with and applying all applicable anti-trust and competition laws. We will conduct all business to ensure that we do not infringe these rules including, without limitation, in relation to the sharing of commercially sensitive information or engaging in anti-competitive practices. We expect the same behaviour from business partners acting on our behalf.

At Thylander, we want open and fair competition and we do not tolerate violation of competition laws and regulations in any jurisdiction. In general, business partners acting on behalf of Thylander should avoid contacts of any kind with competitors that could create the appearance of improper agreements or understandings.

3. Anti-corruption statement

Thylander has a zero-tolerance approach to bribery and corruption in all activities under our effective control and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

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We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We emphasise that any offering or accepting of bribes in any form and no matter how small the amount to any person, whether private or public, direct or indirect, or through third parties, is prohibited and will not be tolerated.

Violation of any anti-bribery and corruption laws and regulations could result in severe penalties, and it could be very damaging to Thylander's business and reputation. Hence, we take our legal responsibilities very seriously.

Thylander expects all business partners to fully comply with these laws. A breach of these laws or standards may result in disciplinary action or termination of any contract to provide services to Thylander.

4. Gifts and entertainment

Any gift or entertainment offered to a Thylander employee to induce or unduly influence a business decision (e.g. awarding business to the supplier, offering favourable terms) is strictly prohibited. If you wish to provide a Thylander employee with a gift or entertainment, it must be reasonable, given only occasionally, and of modest value.

5. Fair employment practices

Thylander is committed to complying with applicable labour and employment laws, including all laws pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages and hours, as well as laws prohibiting forced, compulsory child labour and employment discrimination.

Thylander is also committed to avoid the use of child labour and compulsory labour in its supply chain. Thylander supports the standards set out in UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, and the UN Global Compact's ten principles.

Business partners are expected to comply with these standards.

6. Health and safety

The health and safety of our employees are of utmost importance for Thylander. We require our business partners to operate work environments that promote the health, safety and wellbeing of workers and which strive to create injury-free workplaces.

Our business partners shall:

- ensure a healthy and safe working environment.
- ensure that workers are adequately trained and provided with the proper equipment and working procedures to carry out their work safely.
- recognise that all workers have a right and an obligation to raise health and safety concerns and to cease working if they feel it is unsafe to continue.
- report all health and safety incidents related to our project sites and in our workplaces.
- understand the risks to which their workers are exposed and provide suitable and sufficient mitigation of those risks.
- ensure that emergency preparedness arrangements are adequate for their workers at our project sites and in our workplaces.

7. Reporting of breach

Thylander is committed to upholding the requirements set out in this Supplier Code of Conduct. In case of any breach or suspected breach in Thylander's own organisation or in a business partner's organisation you are encouraged to share this concern with Thylander.

You can do that by writing to Thylander's Head of Legal Maj Blach on mlb@thylander.dk.

Version	Approved	Changes
1.0	25 August 2022	SCoC approved and adopted
2.0	24 August 2023	SCoC approved and adopted