

## **Hageland Group's Ethical Guidelines for Suppliers**

### **Purpose**

For Hageland Group and the members of the Hageland Chain, it is important to have a responsible business practice that respects people, society, and the environment. We conduct our business in a responsible and transparent manner, in dialogue with our partners, with honesty and mutual respect in all relationships. Hageland sees collaboration as a prerequisite for responsible business practice and crucial for achieving the UN Sustainable Development Goals.

### **Principles**

The ethical guidelines for suppliers of goods and services set the minimum standard and must be signed and followed by all of Hageland's suppliers. Suppliers must comply with all relevant national and international laws, as well as internationally recognized standards such as OECD, UN, and ILO conventions for human rights, health and safety, workers' rights, environment, fair competition, anti-corruption, and fair business practices. Hageland Group may require the supplier to document how the guidelines are being followed. To the extent that Hageland Group or Hageland's members are required to report to authorities or consumers, the suppliers must provide information upon request.

### **Guidelines for Ethical Trade (Code of Conduct):**

1. **Relationship with Sub-Suppliers** If the Supplier uses sub-suppliers, the Supplier must ensure that the guidelines are communicated and complied with by its sub-suppliers in the contractual chain.
2. **Compliance with Laws and Regulations** The guidelines set minimum standards. In cases where national laws and regulations or internationally recognized conventions cover the same issues as these guidelines, the strictest requirements shall always apply.
3. **Human Rights** The Supplier shall respect and ensure that it does not contribute to the violation of internationally recognized human rights, and shall conduct its business in accordance with the European Convention on Human Rights of November 4, 1950 (ECHR) and the UN general principles of human rights.
4. **Environment and Climate** The Supplier shall comply with national and international environmental laws and regulations, as well as relevant national and international environmental standards. The Supplier shall also obtain and adhere to relevant permits. Measures to reduce negative effects on health and the environment throughout the value chain shall be implemented by minimizing emissions, promoting efficient and sustainable resource use, including energy and water, and minimizing greenhouse gas emissions in production and transportation. The local environment at the production site shall not be exploited or harmed by pollution. The Supplier shall have a "precautionary principle" regarding pollution, environmental risks, and other environmental and climate challenges, and shall take care of climate and the environment in its decisions.

## 5. Workplace Conditions

### **Forced Labor/Slave Labor (ILO Conventions No. 29 and No. 105)**

There shall be no form of forced labor, slave labor, or involuntary work. Workers should not be required to deposit money or identity papers with the employer, and they should be free to terminate their employment with reasonable notice.

### **Child Labor (UN Convention on the Rights of the Child, ILO Conventions No. 79, No. 138, No. 182, and ILO Recommendation No. 146)**

The minimum age for workers shall not be less than 15 years, in accordance with:

- National minimum age for employment, or
- Minimum age for compulsory schooling, with the higher age prevailing.

If the local minimum age is set at 14 years in accordance with the exception in ILO Convention No. 138, this may be accepted. The recruitment of child laborers in violation of the aforementioned minimum age shall not take place. Children under 18 years of age shall not engage in work that is detrimental to their health, safety, or morals, including night work.

### **Freedom of Association and the Right to Collective Bargaining (ILO Conventions No. 87, No. 98, No. 135, and No. 154)**

Workers shall have the right to join or establish trade unions of their choice, and to bargain collectively without exception. Employers shall not discriminate against union representatives or hinder them from performing their union duties. If these rights are limited by law, the employer shall facilitate, and under no circumstances hinder, parallel mechanisms for free and independent organization and negotiation.

### **Discrimination (ILO Conventions No. 100 and No. 111, and UN Convention on the Elimination of All Forms of Discrimination Against Women)**

There shall be no discrimination in the workplace based on ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation. Protection shall be established against sexually coercive, threatening, offensive, or exploitative behavior, as well as against discrimination or dismissal on unreasonable grounds, such as marriage, pregnancy, parental status, or HIV status. Workers with the same experience and qualifications shall receive equal pay for equal work.

### **Harsh Treatment**

Physical abuse or punishment, or the threat of physical abuse, shall be prohibited. The same applies to sexual or other abuse, as well as various forms of humiliation.

### **Health, Environment, and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)**

Workers shall have a safe and healthy work environment. Necessary measures shall be taken to prevent and minimize accidents and health hazards resulting from or related to conditions in the workplace. Workers shall receive regular and documented training in health and safety. Health and safety training shall be repeated for new hires. Workers shall have access to clean sanitary facilities and clean drinking water. If relevant, the employer shall also ensure access to facilities for the safe storage of food. If the employer provides

accommodation, it shall be clean, safe, adequately ventilated, and have access to clean sanitary facilities and clean drinking water.

## 6. Illegal Business Practices

**Corruption, Bribery, Extortion, and Other Illegal Business Practices** The Supplier shall refrain from all forms of illegal business activities. Hageland Group has a zero-tolerance policy for corruption, bribery, extortion, and other illegal business practices. The Supplier shall not offer, demand, receive, or provide any form of undue advantage to public officials, international organizations, or other third parties for the purpose of obtaining personal or business benefits for themselves or others. This applies regardless of whether the advantage is offered directly or indirectly through an intermediary.

**Gifts, Entertainment, and Courtesies** The Supplier shall not, directly or indirectly, offer gifts to employees, representatives, or anyone closely related to employees of Hageland Group or its chain members, unless the gift is of very modest value. The Supplier shall under no circumstances offer monetary gifts. Furthermore, under no circumstances should gifts, entertainment, or other courtesies be offered or provided in connection with contract negotiations. Courtesies such as social events, meals, or entertainment may be offered if there is a business aspect involved, and the cost is kept at a modest level.

**Money Laundering** Money laundering is illegal and punishable. The Supplier shall distance itself from all forms of money laundering and establish measures to prevent the company's financial transactions from being used for money laundering.

**Fair Competition** The Supplier shall not engage in or be part of any agreement, activity, or arrangement that has the purpose or effect of preventing, restricting, or distorting competition, such as illegal pricing collusion, illegal market cooperation, or any behavior that constitutes a violation of competition laws.

## 7. Conflict of Interest

The Supplier shall inform Hageland of any circumstances that may create problems for the Supplier's independence or may create a conflict of interest during the execution of the assignment.

8. **Compliance with Ethical Guidelines** The Supplier is obligated to adhere to the requirements outlined in these guidelines in its own operations. The Supplier is further obligated to ensure that subcontractors contributing to the fulfillment of the contract with Hageland also follow these guidelines. Hageland may request documentation of the Supplier's own compliance with these guidelines and the compliance of subcontractors.

9. **Reporting Violations of Ethical Guidelines** Both parties are obliged to report the other party about violations or reasonable suspicion of violations of these guidelines. This reporting obligation applies to both matters within the Supplier's own organization and matters involving subcontractors throughout the contract chain.

10. **Sanctions for Violations** Violations of the guidelines constitute a breach of contract. The Supplier's breach of the guidelines is considered a serious matter that may result in sanctions against the Supplier, including contract termination, claims for damages, and reporting to relevant authorities. In case of a breach of contract, the Supplier is obliged to rectify the identified deficiencies and/or require the subcontractor to make such rectifications. The corrections shall be documented in writing. Hageland may demand that the financial loss incurred due to the breach be covered by the Supplier, regardless of whether the breach was committed by the Supplier or the Supplier's subcontractors