

# Supplier Code of Conduct



## Governance

### PURPOSE

Ergonomic Solutions (“ES” or “company” or “we” or “us”) is committed to make a positive impact on society and the world. We have formulated various policies, procedures and practices in our operations and strategy that include ethical business practices and regulatory compliance.

We in turn expect the same commitment from our suppliers, by following this Supplier Code of Conduct (“SCC” or “Code”) and the principles stated within our Sustainability Policy, playing their part in building a fair and sustainable global economy.

### SCOPE

ES expects all our agents, consultants, contractors, distributors, manufacturers, suppliers (their subcontractors) and other business partners, as well as their respective employees, agents, and representatives (collectively “Suppliers” or “you”) with whom we do business to embrace and share our commitment to integrity and compliance with the law. While we recognise the different legal and cultural environments in which our Suppliers operate throughout the world, we expect our Suppliers to follow the principles set forth within this SCC and to take steps to ensure compliance with applicable local laws and regulations.

This Code applies to all our suppliers from January 1st, 2023. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any applicable contractual provision, the contractual provision will prevail unless inconsistent with applicable law.

### THE POLICY

All our Suppliers must conduct their business activities in full compliance with all applicable laws and have internal policies and procedures in place for the following issues:

#### Environmental protection and compliance

‘Respect our Planet’ is one of our core beliefs. ES recognises its social responsibility to protect and regenerate the environment. As a part of this commitment, all ES Suppliers must, without limitation:

- Obtain and maintain all required environmental permits, regulatory approvals, and registrations.

- Comply with all applicable environmental laws and regulations, including but not limited to laws and regulations that regulate the
  - (i) Air, soil and water emissions and wastes;
  - (ii) Management and disposal of hazardous materials;
  - (iii) the protection of natural resources, wildlife and wetlands and
  - (iv) recycling and other laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in manufacturing or product design.
- Commit and Support creating eco- friendly products by integrating the concepts of Circular Economy i.e. Reduce, Reuse and Recycling in Material Consumption, Design, Quality, Packaging and Disposal.
- Prevent or eliminate waste of all types, including water discharges and energy losses, by implementing appropriate conservation measures in Supplier facilities through:
  - efficient operational use of assets i.e. re-use and recycling
  - switch to clean/ low impact Renewable Energy options for gas and electricity consumption - by using energy saving products and technology/ innovation
- Identify any hazardous chemicals, waste, or other materials that may be released, and which may pose

a threat to the environment, and manage such chemicals or materials appropriately to ensure their safe handling, movement, storage, use, reuse, recycling, and disposal.

We expect all ES suppliers to work towards:

- Measuring, Monitoring and Reporting greenhouse gas (GHG) emissions. Disclose complete, consistent, and accurate scope 1 and 2 GHG emissions data.
- Clean fuel on transportation by switching to ultra low emission vehicles.

### Fair labour practices and human rights

**Compliance of Human Rights:** Our suppliers must share ES's commitment to respect all human rights-

- Provide equal opportunity in the workplace as set forth in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact Principles, the ILO Core Labour Standards, and the European Convention on Human Rights. Take effective measures to remedy any adverse human rights and fair labour impacts, including the disclosure of all potential violations.
- *Prohibit child labour:* Child labour must not be used under any circumstances. Suppliers must not employ anyone under the age of 14, under the age for completing compulsory education, or under the legal minimum working age for employment, whichever requirement is most restrictive.

- *Prohibit forced Labour and human trafficking:* All Suppliers, including recruiters, employment agencies, sub-agencies, and recruitment firms, are prohibited from using forced labour and trafficking in persons. All forms of forced labour are prohibited.
- *Access to Clean water:* Suppliers must provide access to clean drinking water for all employees' health and personal needs and ensure that only potable water is used for these purposes.
- *Modern Day Slavery:* Suppliers must identify and eliminate any slavery and human trafficking in their business and supply chains, and act ethically and with integrity in all their business relationships.

### Compliance with employment laws and regulations:

- *Make conditions of employment clear when hiring:* Suppliers must prohibit the use of misleading or fraudulent practices during the recruitment or employment process. All contracts must (1) clearly convey the conditions of employment in a language understood by the worker, and (2) reflect applicable laws and regulations.
- *Provide fair and competitive compensation and other benefits.* Suppliers must provide fair compensation for all employees and workers, including employees who are permanent, temporary, or dispatched, migrant workers, apprentices, and contract workers. Such compensation must meet the legal minimum standards i.e. minimum living wages or 10% above local minimum wage (in jurisdictions without a living wage standard) as required by local law or collective agreement.

- *Treat employees with dignity and respect:* Suppliers must not engage in any inhumane or harsh treatment, including any form of violence, gender-based violence, sexual or other harassment including psychological harassments or threats, corporal punishment, mental or physical coercion, bullying, public shaming or sexual abuse. Verbal abuse or other forms of intimidation are also prohibited.
- *Working hours requirements:* Suppliers are prohibited from requiring workers to work more than the maximum hours as set by international standards. Suppliers must ensure overtime is voluntary and paid in accordance with local and national laws or regulations.
- *Freedom of association and right to collective bargaining:* Suppliers must respect workers' rights to freedom of association, collective bargaining, form trade union representations and peaceful assembly in accordance with local legal requirements.
- *Training and Development:* We would like our Suppliers to invest in the performance appraisal of employees by conducting regular training and development sessions and encouraging them to grow within the organisation.

**Non-discrimination (Diversity & Inclusion):** Our business culture and company policies promote mutual respect, acceptance, and cooperation. Our suppliers too are expected to commit to fostering a diverse and inclusive work environment and recognise opinions and perspectives that employees with varying backgrounds and cultures bring.

Suppliers must commit to a workplace free of harassment and unlawful discrimination in employment on the basis of age, ancestry, citizenship, colour, family or medical care leave, gender identity or expression, genetic information, immigration status, marital or family status, medical condition, national origin, physical or mental disability, political affiliation, union membership, race, religion, sex (including pregnancy), sexual orientation and any other characteristic protected by applicable local laws, regulations, and ordinances.

Support all forms of legal youth employment, including the development of legitimate workplace apprenticeship programs for the educational benefit of young people, wherever possible.

**Health And Safety:** Our Suppliers are required to develop and implement health and safety management practices in all aspects of their business. Without limitation, Suppliers must:

- Provide a safe and healthy work environment for all employees, take action to minimise the causes of hazards inherent in the working environment, and implement controls.
- Establish policy, roles, responsibilities, and accountabilities for Health & Safety management, and also provide appropriate communication channels for employee access to health and safety information.
- Comply and implement a process to ensure that their employees comply with all applicable occupational health and safety laws and regulations, including but not limited to requirements that

address occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing. If it's not safe, don't do it.

- Prohibit the use, possession, distribution, or sale of illegal drugs.
- Commit to build a healthy workplace culture to enhance all employees' mental health & wellbeing.

### Business practices and ethics

Our Suppliers must:

**Antitrust:** Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.

**Anti-Corruption:** ES does not tolerate corruption and bribery. We comply with the anti-corruption treaties and laws of the countries in which we do business. This also includes rules around accepting and providing gifts from and to any stakeholder of the company. We expect our Suppliers to Conduct business in full compliance with local legislation covering bribery, fraud, theft and corruption and the principles set out in the EU Policy against Corruption and COM (2003) 317 final and the American Foreign Corrupt Practices Act (FCPA).

**Conflicts of Interest:** Be honest, direct, and truthful when answering questions from ES about relationships with our employees. Avoid improprieties and conflicts of interest or the appearance of either.

**Community relations:** Commit to establish and maintain the highest standards of corporate social responsibility in your business activities, be a good corporate citizen and contribute to the well-being of local communities. To give back to the community, encourage and support your employees to volunteer and participate in our periodic community activities and initiatives with strategic partners.

**Effective grievance procedures:** Provide employees with effective grievance procedures for raising workplace concerns, including concerns involving harassment and discrimination, to the attention of management for appropriate resolution. Workers must be given a safe environment to provide their grievances and feedback.

**Ethical Sourcing:** Follow standards for the responsible, sustainable and ethical sourcing of all goods and services. We expect our suppliers to adhere to these standards.

**Integrity:** Promote an open and honest workplace in which you mutually respect each other and treat each other equally. Suppliers must encourage employees to come forward if misconduct occurs either through our Whistleblower Policy or via any other grievance mechanism.

**Promote Digital Payments:** Avoid business transactions in cash by promoting and using digital payment solutions for receiving and making payments. i.e. bank accounts and /or mobile money.

**Systematic Risk Management:** We suggest our suppliers to develop mechanisms to monitor and manage their Financial and Non-Financial Risks and set effective processes to minimise the same.

## Legal and regulatory practices

Our Suppliers must:

**Accuracy of Business records:** Record and maintain information and documentation honestly and accurately. All financial records and accounts related to ES's business reflecting transactions, payments and events must conform to generally accepted accounting principles, internal controls, policies and applicable laws. Also, when asked, provide us with accurate and complete billing information concerning all our transactions.

**Business Information Reporting:** All business information and reporting activities are to be conducted honestly and accurately and comply with all applicable laws regarding their completion and accuracy.

**Communication:** Be honest, direct, and truthful in discussions, including those with regulatory agency representatives and government officials.

**Trade:** Comply with all international laws, national laws, regulations, and other controls which govern the transfer, access, export, re-export, and import of products, services, and technology. Suppliers must maintain, where applicable, robust compliance programs and policies to manage technologies, products, and technical data that is controlled or restricted by law.

### Protection

Our Suppliers must respect intellectual property rights, protect confidential information, and comply with international and national privacy rules and regulations.

**Business Continuity:** Ensure maintenance of a measurable, documented emergency response and

disaster recovery plan to guarantee the protection of data and property.

**Physical and Intellectual Property:** The Suppliers must protect and responsibly use our physical and intellectual assets, including intellectual property (copyrights, patents, trademarks, and trade secrets), tangible property, supplies, consumables, and equipment, when authorised by us to use such assets.

**Security:** Disclose and ensure any identified vulnerabilities are addressed immediately. Not provide access to ES' information, or customer information, without a legitimate business need, and permission from the responsible owner. Not bypass security controls, restrictions, or any other security measures.

**Privacy:** Follow all relevant local, national and international data privacy and protection laws and regulation. Honour privacy choices by using data only as agreed to by ES representatives or ES's customers. Also provide clear and accurate privacy notices when collecting or processing personal data.

## MONITORING AND REVIEW

While Our Suppliers are expected to self-monitor and demonstrate their compliance with the SCC, ES may, after giving reasonable notice, inspect Suppliers facilities or conduct remote audits to confirm compliance and also will request that you share evidence of certain policies.

This document shall be updated annually.

### Performance evaluation

Mutual trust and transparent dialogue are central to ES's intentions to continue to grow with Suppliers that show

continuous improvements in their sustainability performance. To enable effective performance evaluation and dialogue, ES reserves the right to request sustainability performance data from Suppliers. Suppliers may also be subject to Supplier Evaluation Questionnaire conducted by ES or assessors representing ES. When submitting information in the Supplier Evaluation Form on sustainability performance, Suppliers are expected to be transparent and not intentionally mislead ES.

Non-transparency is regarded as a violation of this SCC. Transparency is also the essential starting point to recognise and address industry-wide and systemic sustainability challenges. ES will continuously engage with Suppliers, industry, local communities and governments to promote collective actions and systemic changes needed to improve social and environmental sustainability. We encourage our Suppliers to do the same.

## CONSEQUENCES OF NON-COMPLIANCE

Suppliers that behave in a manner that is unlawful or inconsistent with the SCC, or any ES policy, risk termination of their business relationship with us. Complying with the SCC is required in addition to meeting any other obligations contained in any contract with us.

To report questionable behaviour or a possible violation of the SCC, Suppliers are encouraged to work with their primary ES contact in resolving their concern. If that is not possible or appropriate, please contact us through one of the methods prescribed below:

- Contact Chief Operations Officer Per Bjerring

- E-mail: [per.bjerring@ergonomic.solutions](mailto:per.bjerring@ergonomic.solutions)
- Telephone: +45 96 34 66 06
- Whistleblower Portal via the homepage  
<https://ergonomic.solutions>

## Other references

[Ethics Policy >](#)

[Whistleblower Policy >](#)

This policy applies to Ergonomic Solutions  
International Limited and subsidiary companies

