

BIRN GROUP - SUPPLIER CODE OF CONDUCT

April, 2024



Vald. Birn A/S comprises the following companies. Unless otherwise documented, the requirements contained in this Supplier Code of Conduct are valid for all units in the BIRN Group.





General Principles

The BIRN Group Supplier Code of Conduct outlines the minimum requirements that apply for all business relationships between BIRN Group and its suppliers.

Suppliers are required to conduct their business in compliance with applicable laws and regulations, in the country in which it operates, and with the principles stated in this code.

If the local laws or customs in a country are stricter in relation to the BIRN Group Supplier Code of Conduct, such laws and customs should always apply. On the other hand, if the laws and customs are less strict than this Code of Conduct, then BIRN Groups Code of Conduct should prevail.



Business Principles

Suppliers are expected to conduct their business ethically and with integrity. The relationship between the BIRN Group and its supplier must be based on trust, transparency, honesty, and accountability.

Accounting and reporting

All suppliers and their subcontractors shall report financial transactions in accordance with generally accepted accounting practices and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

Suppliers shall report report all financial and non-financial information, in accordance with regulations and prevailing industry practices, in a transparent, truthful and timely manner with the aim of conveying a true view of their performance.

Disclosure of information

Birn Group are committed to providing accurate, timely, and transparent information about operations, performance, and impact to employees, customers, investors, regulators, and the public. We recognize the importance of disclosure of information for maintaining trust and for promoting accountability and responsible business practices. Thus we strive to disclose all relevant information, including financial, social, and environmental information, in a clear and accessible manner and in compliance with all applicable laws and regulations.

Anti-corruption

Suppliers and their subcontractors must conduct their operations and transactions in compliance with applicable laws and regulations relating to anti-bribery and anti-corruption.

Suppliers must ensure that their employees, subcontractors and other representatives do not grant, offer or accept bribes, facilitation payments, inadmissible donations or other inadmissible payments or undue benefits to or from customers, officials or other business partners, that could affect or appear to affect their objectivity in their business decisions.

Money laundering

BIRN Group will not accept, facilitate, or support money laundering. Suppliers shall ensure that the applicable legal money laundering and terrorism financing provisions are not breached.

Conflict of interest

Personal interests or relationships shall not influence suppliers in their decision making, only objective and fact-based criteria are valid.



Fair competition practices

BIRN Group strives to act in a fair manner and with integrity and expects the same from its suppliers. The suppliers are required to comply with valid and applicable competition and antitrust laws and regulations. And the suppliers will not exchange information, enter agreements or understandings with competitors, customers or sub-suppliers in a way that improperly influences the marketplace or the outcome of a bidding process.

Personal information

Suppliers are required to comply with applicable data protection laws and regulations. And to protect the personal data of employees, former employees, customers, suppliers, and other persons concerned.

Suppliers shall only collect, process, use and store personal data where there is the consent of the person concerned, a contractual agreement or some other legal basis.

Intellectual property rights

Suppliers shall respect intellectual property rights and protect associated information.

Export controls and economic sanctions

Suppliers shall comply with applicable export control laws and economic sanctions, and they shall ensure that operations do not contribute to the proliferation of weapons of mass destruction.



Principles of Human Rights and Social Justice

BIRN Group fundamentally affirms that all people should be treated with respect and dignity.

Human rights

Suppliers are expected to support and respect the protection of internationally proclaimed human rights and make sure that they or their business partners are not complicit in human rights abuses.

Non-discrimination

Suppliers must not engage in any form of discrimination based on gender, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background or other characteristics protected by applicable law.

Discrimination, physical or verbal harassment, or any illegal threats shall not be tolerated. All employees must be treated with respect, dignity, and common courtesy.

Workplace practice

Suppliers shall provide their employees with the conditions for a safe and healthy work environment, that comply with all applicable legal requirements.

Forced labor

There can be no forced labor of any kind relating to BIRN Group's business, products, or services. Suppliers shall ensure that they do not engage in any form of forced, bonded, compulsory, trafficked, modern slavery or non-voluntary labor.

Child labor

Child labor is not tolerated.

Under no circumstances should employment be offered to a person younger than 15 years of age or younger than the countries legal minimum age, if higher than 15.

Freedom of association

Suppliers shall respect the basic right of employees to freely, voluntarily and without interference establish and join, or not join, unions and employee representation of their own choice and to bargain collectively, where permissible by local laws.

Working hours and compensation

Suppliers shall comply with applicable laws, agreements and industry standards on working hours and compensation (including but not limited to overtime and overtime compensation).



Ethical recruiting

Suppliers shall hire workers lawfully, in line with the International Labour Standards, and in a fair and transparent manner that respects human rights.

Workers must receive a written notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.

Diversity, equity and inclusion

Suppliers should promote inclusive cultures where diversity is valued, and where the employees are able to contribute fully and reach their full potential. Diversity should be encouraged in all levels of the workforce and leadership.



Environmental Principles

BIRN Group and their suppliers should at all time endeavor to reducing the environmental footprint of their operations, products, and services, as well as reducing natural resource usage. They shall comply with all applicable environmental laws and regulations.

Resource efficiency

Products and processes must be designed in such a way that energy, natural resources, and raw materials are used efficiently, and waste and residual products are minimized.

Responsible sourcing of minerals and metals

Suppliers are expected to use only minerals and metals that have been extracted and traded in such a way that does not contribute to human rights abuses, unethical business conduct (e.g. corruption), environmental damage or funding for conflicts.

Precautionary principle

Suppliers shall avoid materials and methods, posing environmental and health risks to a person or society, when suitable alternatives are available.