



CODE OF CONDUCT

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INTRODUCTION

This Code of Conduct defines the basic requirements placed on the suppliers and third party intermediaries of Aalborg Gummivarefabrik A/S. It outlines responsibilities towards stakeholders and the environment.

Aalborg Gummivarefabrik A/S reserves the right to change the requirements of this Code of Conduct. In such event, Aalborg Gummivarefabrik A/S expects business partners to accept and implement the required changes within reasonable time.

REQUIREMENTS

All business partners of Aalborg Gummivarefabrik A/S must at all times ensure:



LEGAL COMPLIANCE

- to comply with all relevant laws and regulations.



PROHIBITION OF CORRUPTION AND BRIBERY

- to tolerate no form of and not to engage directly or indirectly in any form of corruption or bribery
- not to grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage.



FAIR COMPETITION, ANTI-TRUST LAWS AND INTELLECTUAL PROPERTY RIGHTS

- to act in accordance with national and international competition laws and not to participate in price-fixing, market or customer allocation, market sharing or bid rigging with competitors
- to respect the intellectual property rights of others.



CONFLICTS OF INTEREST

- to avoid all conflicts of interest that may adversely influence business relationships.





RESPECT FOR BASIC HUMAN RIGHTS OF EMPLOYEES

- to promote equal opportunities and treatment of employees irrespective of skin colour, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age
- to respect personal dignity, privacy and rights
- to refuse to employ or make anyone work against their will, and to ensure that no forced labour or human trafficking is present, also not at any partners and sub-contractors. And to ensure active follow up on this point
- to ensure that all employees have an understandable hiring note/contract covering basic employment rights and duties such as but not limited to:
 - layoff and resignation notice
 - an understandable salary statement that includes regular and overtime hours
 - regular and overtime earnings and deductions
 - payment according to the applicable laws, industry standards or relevant collective agreements, and no less than the minimum wage
 - minimum one weekly day off
 - procedure in case of illness.
- to ensure that management support employees' right to freely associate and collectively bargain without unlawful interference. And to recognise, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organisations or trade unions.
- to refuse to tolerate any unacceptable treatment of employees including gestures, language and physical contact, such as but not limited to:
 - harsh or degrading treatment
 - sexual or physical harassment
 - mental, physical or verbal abuse
 - coercion or intimidation in any circumstances in the workplace and premises linked to the company.
- to comply with the maximum number of working hours in applicable laws
- to comply with ILO convention C143, Migrant workers.





PROHIBITION OF CHILD LABOUR

- to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14
- to follow national laws which permit employment of children between 12 and 15 years to perform very few hours of light work per day. This must not interfere with the children's education
- to employ no workers under 18 years to perform any type of work, which can jeopardise their health, safety or morals.



ENVIRONMENTAL PROTECTION

- to act in accordance with the applicable statutory and international standards regarding environmental protection
- to minimise environmental pollution and make continuous improvements in environmental protection
- to set up and use a reasonable environmental management system.



SUPPLY CHAIN

- to ensure compliance with this Code of Conduct among suppliers and follow up on compliance
- to comply with the principles of non-discrimination with regard to supplier selection and treatment.



CONFLICT MINERALS

- to take reasonable efforts to avoid the use of raw materials, which directly or indirectly finance armed groups, who violate human rights.



HEALTH AND SAFETY OF EMPLOYEES

- to take responsibility for the health and safety of its employees
- to control hazards and take the best reasonably possible precautions against accidents and occupational diseases
- to provide training and ensure that employees are educated in health and safety issues
- to provide Personal Protection Equipment (PPE), and monitor the usage of PPE
- to set up and use a reasonable occupational health & safety management system.



ETHICS HELPLINE

- to ensure that employees, managers and external stakeholders are able to raise concerns anonymously, and that these are solved in a fair way and without any form of retaliation against the person who raised concern.



DATA SECURITY AND PRIVACY

- to follow all legal requirements for data protection and to remain committed to protect rights and privacy as stipulated in the European GDPR (General Data Protection Regulation).



Place, date

Name (CAPITAL LETTERS), Function

Signature

Company Seal

This document must be signed by an authorized signatory of the company and returned to A.A.G Aalborg Gummivarefabrik A/S within 15 working days (3 weeks) of receipt.

