

AALBORG GUMMIVAREFABRIK A/S

Code of Conduct

Standards for responsible and ethical business partnerships

Solutions in rubber, plastic and foam for your industry

Introduction

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

AAG | 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.

At AAG | Aalborg Gummivarefabrik A/S, we believe responsible business conduct is fundamental to long-term partnerships. We expect every supplier and business partner to operate with integrity, respect for people, and responsibility toward society and the environment.



Requirements

All business partners of AAG I 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 neither engage in nor tolerate any form of corruption or bribery, whether direct or indirect.
- not to grant, offer or promise anything of value to a government official or to any individual or organization 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, customer allocation, market sharing, or bid-rigging practices.
- to respect the intellectual property rights of others.

Conflict 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, including among suppliers, subcontractors, and other business partners, and to actively monitor compliance in this area.
- to ensure that all employees have a clear and understandable employment 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
 - procedures relating to illness and sick leave.
- to ensure that management supports employees' right to freedom of association and collectively bargain without unlawful interference.
- to recognise, as far as legally possible, the right of free association of employees and to neither discriminate against nor unfairly favor members of employee organizations 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 comply with national laws permitting employment of minors between 12 and 15 years of age for limited light work. This must not interfere with the child'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

Suppliers shall:

- Comply with environmental laws and standards
- Implement an Environmental Management System (ISO 14001 or equivalent)

- Reduce environmental impact by monitoring and improving performance related to:
 - CO₂ emissions
 - Energy consumption
 - Waste and water usage
- Maintain relevant environmental data and provide it upon request

Supply chain

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

Conflict minerals

- to make reasonable efforts to avoid sourcing 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 identify workplace hazards and take all reasonably possible precautions to prevent 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 report concerns confidentially, and that such concerns are addressed fairly 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 protecting personal data, privacy, and individual rights as stipulated in the European GDPR (General Data Protection Regulation).

Due Diligence & Compliance Monitoring

Suppliers must:

- Perform regular self-assessments
- Maintain documentation demonstrating compliance

- Allow AAG to:

- Conduct audits (on-site or remote)
- Request documentation
- Follow up on corrective actions

Non-Compliance & Corrective Actions

In case of non-compliance:

- Suppliers must implement corrective actions within agreed timelines
- AAG reserves the right to:
 - Suspend cooperation
 - Terminate contracts in case of severe or repeated violations

Governance & Responsibilities

Suppliers must:

- Assign responsibility for compliance internally
- Train relevant employees
- Integrate this Code into policies and procedures

