SUPPLIER CODE OF CONDUCT

UPSTRÖM ApS

Østergade 24

8883, Gjern

Denmark

CVR: 41166096

This Code of Conduct outlines UPSTRÖMs expectations in regards to safe, fair and healthy working conditions and environmental responsibility throughout the supply chain.

With this code our intent is to build well founded and long-lasting relationships with like-minded suppliers, with the aim of creating products of the highest quality possible.

It's important for us that our suppliers seek to improve their labor, health, environmental and safety conditions for their workplace, as well as promoting a respectful, ethical and fair treatment of all employees.

In the unfortunate case that a supplier cannot live up to this code of conduct and refuse to make the necessary improvements, we will ultimately have to terminate the relationship.

Requirements

Compliance

- o It's expected of the supplier to comply with all relevant laws and regulations of the country in which the company operates and employs its workers.
- o It's also expected of the supplier to comply with UPSTRÖMs Code Of Conduct in all of its entirety.

Ethics

 It's expected of the supplier to treat its employees, agents, contractors and costumers with dignity.

Humane treatment

o It's expected of the supplier to prevent the harassment and/or abuse of workers.

• Freely Chosen Employment

- It's expected of the supplier to not participate in forced labor of any forms, including but not limited to:
 - Prison labor, indentured labor or bonded labor.

Child Labor

 It's expected of the supplier to not engage in child labor of any kinds. Hiring practices must conform to the laws and regulations of the country. Hiring practices for juvenile workers must also conform with the International Labor Organization (ILO) conventions (138 and 182), ensuring that the workers' health, safety or morals are not compromised

Working conditions

o It's expected of the supplier to provide and maintain a safe, healthy, sanitary and respectful work environment.

• Anti-discrimination

 When hiring employees, it's expected of the supplier not to discriminate on basis of gender, race, religion, age, disability, sexual orientation, nationality, political affiliation, social- or ethnic origin.

• Freedom of Association and Collective Bargaining

 It's expected of the supplier to allow all employees to freely join any organization of their choice as well as the right to refrain from any organization of their choice. It's also expected of the supplier to allow the workers the right for collective bargaining.

Working Hours

 It's expected of the supplier to manage a regular working week, where workers shall not exceed 48 hours of work or the maximum allowed by the country of manufacture, whichever is less. All overtime work must be consensual and the total sum of weekly working hours must not exceed 60 hours or more than six consecutive days, without 24 hours of rest (ILO Convention 1).

Wages

 It's expected of the supplier to pay wages that is equal to or higher than the minimum wage and comply with all legal requirements within this matter. We encourage suppliers to commit to improving the living standards of their workers by exceeding the legal requirements and pay above the minimum wage.

Overtime wages

 It's expected of the supplier to compensate workers for overtime hours, at a rate that is compliant with laws and regulation in the country of manufacture. In countries where such laws do not exist, the rate must exceed the regular hourly wage.

Quality

 It's expected of the supplier to have a documented quality system and quality improvement plan, that includes a reliable "in process" and final goods audit, that comply with UPSTRÖM's standards.

• Environmental Responsibility

 It's expected of the supplier to comply with all applicable environmental laws and be committed to environmental responsibility, either through written environmental policies, certificates or other relevant standards.

The supplier must provide UPSTRÖM with all available material related to their environmental responsibility practices.

Product safety and regulatory compliance

o It's expected of the supplier to ensure that all products and/or services conform with the applicable regulations and laws regarding product safety and environment.

Conflict Materials

 It's expected of the suppliers not to use any materials of conflict in products or components.

• Code of communication

 We encourage our suppliers to share our code of conduct with all workers, managers, supervisors in the local language. We also encourage our suppliers to facilitate educational efforts for current and new employees about UPSTRÖMS Code of conduct.

Contact us

 Should you hold any knowledge about any of our suppliers violating any of the abovedescribed items, please let us know.

Feel free to contact us at info@upstrom.dk

I, the undersigned, herby declare that understand and comply with this code of conduct.		
Signature	Company name	
Date	Position in company	

Continued on next page

Supplier Quality and Environmental Declaration

Company:				
Address:				
Phone No.:	E-mail:	Website:		
Quality Manager:	Environmental Manager:			
	<u> </u>			
Quality Management System				
Do you have a certified quality man	agement system?			
Yes SO9001 Other:	Certified year:			
□ No				
Please, answer question 2-4 if you do		gement system.		
2. Do you have a documented and imp	plemented a quality policy	□No		
3. Do you have any quality demands o	n your sub suppliers?	ays 🔲 Never		
4. Describe briefly how you perform quality control of our goods before shipment:				
Environmental Management System				
5. Do you have a certified Environmental management system?				
☐ Yes ☐ ISO14001 ☐ Other: Certified year:				
□No				
Please, answer question no 6-7 if you	do <u>not</u> have a certified environme	ntal management system		
6. Do you have a documented and imp	lemented an environmental policy	? □Yes □No		
7. Does the production of our product comply with local and national environmental legislation of your				
country?				
☐ Yes ☐ No				
8 A. Have you identified and documented the significant environmental aspects of your company?				
□Yes □No				
8 B. What do you do to reduce your environmental impact? Describe your action plan in a few words				
9. Do you check that all parts in the su	nnlier chain comply with the nation	nal environmental laws and		
9. Do you check that all parts in the supplier chain comply with the national environmental laws and legislation of each individual country?				
□Yes □No				
	ntal demands on your suppliers?]Yes □ No		

Chemical management	
11. Do you have a program for handling chemicals in a safe way for hur ☐ Yes ☐ No	mans and environment?
Energy saving program	
12. Do you have a program to minimize your energy consumption and ☐ Yes ☐ No	emissions of greenhouse gases?
Waste management	
13. Do you have a waste management system to reduce waste and reco	ycle? □Yes □No
Social responsibility	
14. As employer do you comply with the local and national labor legisla ☐ Yes ☐ No	tion in your country?
15. Do you check that all parts in the supplier chain comply with local a each country? ☐ Yes ☐ No	nd national labor legislation of
16. Do you have any additional information or comments that you wou	ıld like to submit?
I, the undersigned, herby declare that all given information in this docum	nent is true and correct.
Signature	Company name
Date	Position in company