



**SUPPLIER CODE OF CONDUCT - THE MARIUS PEDERSEN GROUP  
DECEMBER 2024**

**TABLE OF CONTENT**

<b>1. Introduction.....</b>	<b>3</b>
1.1. Our Commitment .....	3
1.2. Basis for this Supplier Code of Conduct .....	4
1.3. Our Requirements for Suppliers .....	4
<b>2. Confidentiality.....</b>	<b>5</b>
<b>3. Adherence to Applicable Law .....</b>	<b>5</b>
<b>4. Supplier Code of Conduct Contract Clause.....</b>	<b>5</b>
<b>5. Human Rights &amp; Labour .....</b>	<b>5</b>
5.2. Non-discrimination.....	5
5.3. Labour .....	6
<b>6. Health, Safety &amp; Social Responsibility .....</b>	<b>6</b>
6.1. Health & Safety .....	6
6.2. Social Responsibility.....	6
<b>7. Money Laundering .....</b>	<b>7</b>
<b>8. Anti-Corruption and Bribery .....</b>	<b>7</b>
<b>9. Fair Competition &amp; Antitrust .....</b>	<b>7</b>
<b>10. Data Privacy and Security .....</b>	<b>7</b>
<b>11. Environment.....</b>	<b>8</b>



## 1. Introduction

### 1.1. Our Commitment

The Marius Pedersen Group (further also as "we") is founded on the application of high ethical standards to create relationships based on trust with our business partners and communities.

Our core principles and values describe and embody the foundation of the Marius Pedersen Group. From the joint mission, aspirations, promises and values:

- **Value Creation** (we focus on profitability, we create value for our customers, we are ready for change)
- **Responsible** (we create room for initiative and share knowledge, we take responsibility for our actions, we have freedom with responsibility)
- **Trustworthy** (we show each other trust and mutual respect, we keep our promises, we show responsibility and engagement to our customers and colleagues)

which have been the guiding lines and principles in the development of the Marius Pedersen Group.

Across our business activities, we comply with all applicable laws, act in an ethical, socially responsible and sustainable manner, while keeping our core principles and values at the forefront of what we do and how we perform our operations. We practice good corporate governance and respect internationally recognized human rights.



## 1.2. Basis for this Supplier Code of Conduct

This Supplier Code of Conduct is based on the following internationally recognized standards:

- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- UN Guiding Principles on Business and Human Rights.
- The principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work.
- The International Bill of Human Rights.

## 1.3. Our Requirements for Suppliers

The core principles and values of the Marius Pedersen Group set a high benchmark, and we require all suppliers and business partners of the Marius Pedersen Group to comply with this Supplier Code of Conduct and the standards mentioned in section 1.2, and to adhere to high ethical standards and to conduct themselves with integrity, honour, honesty and in strict adherence with applicable law, both professionally and personally.

If a supplier or business partner become aware of any potential violations of this Supplier Code of Conduct, such information must be reported to the designated contact person within the Marius Pedersen Group.

The Marius Pedersen Group has designated Compliance Officers responsible for overseeing compliance with this Supplier Code of Conduct. Suppliers and business partners must cooperate with the relevant Compliance Officer, as needed, to address any compliance concerns. The contact information to relevant Compliance Officer is published on our websites.



## 2. Confidentiality

Confidential and/or business critical information shall be kept secure, and it is forbidden to share in any way with any person or persons not possessing the necessary clearance or permission to be made aware or see the information. This obligation applies both during and after the business relationship with the Marius Pedersen Group.

## 3. Adherence to Applicable Law

All suppliers and business partners are responsible for adhering to any and all applicable law, rules, regulations and guidelines issued by public authorities. If there is a difference between a local legal requirement and this Supplier Code of Conduct (or any other of policies or procedures of the Marius Pedersen Group known by or communicated to the Supplier), the most stringent standard must be applied.

## 4. Supplier Code of Conduct Contract Clause

This Supplier Code of Conduct applies to all contract between the Marius Pedersen Group and a supplier or business partner of the Marius Pedersen Group (all of whom are jointly referred to as "Suppliers"). If the supplier fails to meet this Supplier Code of Conduct and cannot agree on an improvement plan or does not implement the agreed plan, it is considered a breach of contract.

## 5. Human Rights & Labour

### 5.1. Human Rights

Suppliers must respect all internationally recognized human rights, avoid violations of human rights, and take appropriate measures to address any adverse human rights impacts they may be involved in. This should be done in line with the United Nations Guiding Principles on Business and Human Rights (UNGP).

### 5.2. Non-discrimination

Suppliers and business partners shall provide a workplace free from discrimination for reasons such as age, caste, colour, disability, ethnicity, gender, marital status, national origin, political affiliation, pregnancy, race, religion, sexual orientation, union membership.





## 5.3. Labour

Suppliers or business partners are expected to actively support the protection of fundamental rights, wherever their business activities are carried out. Under no circumstances does the Marius Pedersen Group accept child or forced labour in the operations or supply chain of suppliers and business partners.

The Marius Pedersen Group does not accept the use or exploitation of foreign labour in violation of applicable law in Denmark, the Czech Republic or Slovakia or in any of the countries of operation.

Suppliers and business partners shall treat all individuals with respect and dignity and ensure that their operations reflect the same standards.

Suppliers and business partners must ensure that workers are provided with reasonable working hours and adequate breaks during the workday, in compliance with applicable laws. Additionally, workers must be paid on time and in full, in accordance with applicable wage laws, including minimum wages, overtime, and mandated benefits.

## 6. Health, Safety & Social Responsibility

### 6.1. Health & Safety

Suppliers or business partners are expected to provide a professional, inspiring and secure workspace and working environment, pursuant to applicable law, while respecting all individuals and actively seek to secure a good and inclusive working environment, characterized by equality and diversity.

Suppliers or business partners are responsible for ensuring a secure and safe workplace within their operations, including health and safety measures to contractors and subcontractors on supplier sites. Injuries and accidents occurring at work should be logged and investigated, and preventive measures should be introduced.

### 6.2. Social Responsibility

The Marius Pedersen Group values social responsibility and local presence and strive to help and benefit the local communities of which we are part.

Suppliers or business partners are expected to share our commitment to making a positive impact in local communities and surrounding societies in a responsible manner. To the greatest extent practicable, we expect suppliers or business partners to employ local workers in their operations and provide training to improve skill levels.



## **7. Money Laundering**

The Marius Pedersen Group only conduct business with reputable customers, suppliers and business partners involved in legitimate business activities, with funds derived from legitimate resources. We notify the relevant authorities of any reasonable suspicions of money laundering as required under relevant laws.

## **8. Anti-Corruption and Bribery**

All forms of corruption, bribery, extortion and embezzlement are prohibited. Suppliers and business partners shall not pay or accept bribes or participate in either illegal inducements to obtain undue or improper advantage.

Suppliers and business partners shall declare any conflict of interest that may affect the performance of tasks or provision of services to the Marius Pedersen Group.

Suppliers and business partners shall not offer inappropriate financial or material benefits, such as expensive gifts or extravagant entertainment, to the Marius Pedersen Group purchasers or other representatives of the Marius Pedersen Group in an attempt to influence business decisions.

## **9. Fair Competition & Antitrust**

Suppliers and business partners must always respect and adhere to all relevant competition law and antitrust legislation. This includes agreeing not to enter into written, verbal, non- verbal or implied agreements with competitors regarding price fixing, market sharing, bid rigging or other similar activities.

## **10. Data Privacy and Security**

Suppliers and business partners are responsible for safeguarding confidential information and ensuring that all data is used properly and in accordance with applicable laws. Suppliers and business partners must take all reasonable measures to prevent data breaches or loss of sensitive information, including personal data, business information, and other confidential materials.

Suppliers and business partners must comply with applicable privacy and data protection laws, ensuring the protection, security, and lawful use of personal data.



## 11. Environment

Suppliers and business partners must operate in an environmentally responsible and efficient manner, aiming to minimize adverse environmental impacts and conserve natural resources. They are required to comply with all applicable environmental laws and regulations. This includes obtaining and maintaining all necessary environmental permits, licenses, and registrations, as well as adhering to their operational and reporting requirements.

Upon request, suppliers and business partners must provide the Marius Pedersen Group with ESG-related data in accordance with applicable ESG legislation and reporting standards. This ensures transparency and supports compliance with environmental, social, and governance requirements.