



HÅNDVERKS
GRUPPEN

Supplier Code of Conduct



Document Control

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1. Background & Purpose

At Håndverksgruppen (“the Group” or “Håndverksgruppen”) we promote corporate responsibility and sustainability which also extends to our supply chain. We cooperate with our suppliers and business partners in pursuit of this aim. Accordingly, we have prepared this Supplier Code of Conduct (“the Code”) to illustrate what we expect of our suppliers and business partners.

Suppliers to the Group are to supply goods and services that are produced in compliance with applicable laws, regulations, the principles of the Code, and recognized best practices, including:

- The United Nations (UN) Global Compact
- The UN Universal Declaration on Human Rights
- The UN Guiding Principles on Business and Human Rights
- The International Labor Organization’s (ILO) Core Conventions

Key suppliers, as defined below, are expected to communicate the Code to their sub-contractors and encourage compliance.¹ A supplier must be able to document compliance with the Code at Håndverksgruppen’s request. Such documentation may include self-declaration, follow-up meetings, or due diligence conducted by external service providers. In cases where there is a substantiated risk of non-compliance, we reserve the right to conduct additional reviews, including on-site visits at production facilities. Key suppliers are expected to disclose key sub-contractors upon request and cooperate in reasonable due diligence efforts.

2. Scope

The Code sets out the standards that Håndverksgruppen expects all our suppliers to uphold. All key suppliers, defined as those from whom Håndverksgruppen purchases directly and whose products or services are critical to our operations – meaning that a disruption to the relationship would have a material impact on the Group – must formally sign and adhere to the Code.¹ Each country is responsible for identifying the key suppliers within their respective geographies. Other suppliers are provided with a copy of the Code and are expected to adhere to the Code’s principles, and to at all times uphold responsible business practices, even though formal compliance is not actively monitored.

As noted in section 1 above, key suppliers are expected to communicate the Code to their sub-contractors and promote its implementation throughout their supply chain.¹

¹ Some large key suppliers have implemented their own robust Codes of Conduct that govern their operations and extend to their subcontractors and suppliers. Where it is confirmed that these Codes of Conduct are aligned with the principles and requirements of Håndverksgruppen’s own Code, this will be considered sufficient for compliance with this requirement.

Failure to meet the requirements of the Code may result in corrective actions for key suppliers, and in serious cases, termination of the business relationship.

3. Principles of the Supplier Code of Conduct

In the following sections the principles of the Code is outlined.

3.1 Labor & Human Rights

3.1.1 No forced or compulsory labor

Suppliers must not engage in any form of forced, bonded or involuntary prison labor. Workers must never be required to surrender deposits or identity documents as a condition of employment and must be free to leave their employer with reasonable notice.

3.1.2 Freedom of association & collective bargaining

All workers have the right to freely join or form trade unions and engage in collective bargaining. Employers must not interfere with or obstruct these rights and should maintain an open attitude toward union activities. Worker representatives must face discrimination and should have access to carry out their duties. Where legal restrictions exist, employers must support alternative means of independent and free worker representation and bargaining.

3.1.3 No use of child labor

The employer shall not employ any worker below the age of 18 for tasks that may jeopardize their health, safety or morals. The minimum age for workers shall be the higher of:

- the national legal minimum age for employment, or;
- the age of completion of compulsory education.

The employer must review the requirements of the national legislation and if needed consult with experts to determine the type of employment and the corresponding minimum working age. If national law permit employment of young workers aged 16–18, they may only be engaged in non-hazardous work, provided that:

- their health, safety or morals are fully protected; and
- they receive adequate training or vocational education relevant to the job.

No worker under the age of 18 shall perform hazardous work, including but not limited to:

- exposure to dangerous machinery, toxic substances, or extreme temperatures;
- work underground, underwater, at heights, or in confined spaces;
- night work or any tasks that interfere with schooling or development.

Suppliers must implement robust policies and procedures to prevent child labor in their operations and supply chains. If child labor is found, suppliers shall provide remediation measures that ensure the child's safety and enable them to attend and complete compulsory education. Compliance with ILO conventions no. 79, 138 and 182 is mandatory, and suppliers must ensure full alignment with these standards. Adequate support shall be provided to

3.1.4 Dignity and respect

Suppliers must ensure a workplace free from discrimination, harassment, and abuse. There shall be no discrimination in hiring, compensation, training, promotion, termination, or retirement based on ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation.

Suppliers must implement measures to protect workers from harassment, abuse, and unjust termination, including discrimination based on marriage, pregnancy, parenthood or HIV status. Physical punishment, threats, sexual or verbal harassment, and any form of intimidation are strictly prohibited.

3.1.5 Health & Safety

Suppliers must provide a safe, hygienic, and healthy working environment, considering industry best practices and specific workplace hazards. Hazardous chemicals and substances must be carefully managed to minimize risks. Reasonable steps must be taken to prevent workplace accidents and injuries by identifying and mitigating hazards.

Workers must receive regular, documented health and safety training, with additional training provided for new or reassigned workers.

Suppliers must ensure access to clean toilet facilities, potable water, and, where relevant, sanitary food storage facilities. If accommodation is provided, it must be clean, safe, well-ventilated, and include access to clean water and sanitation.

A senior management representative must be assigned responsibility for overseeing health and safety compliance.

3.2 Fair Working Conditions

3.2.1 Wages

Wages and benefits for a standard working week must, at a minimum, comply with national legal standards or industry benchmarks, whichever is higher. Compensation should always be sufficient to cover basic needs and allow for some discretionary income.

Workers must receive a written, clear and understandable contract specifying wage conditions, including taxation details where applicable, payment methods, and pay periods. Wage deductions for

disciplinary reasons are prohibited, and no deductions beyond those required by law may be made without the worker's explicit consent.

3.2.2 Working Hours

Working hours must comply with national laws, collective agreements, and internationally recognized labor standards. A standard working week should not regularly exceed 48 hours, and workers must receive at least one rest day in every seven-day period.

Overtime should be voluntary, limited, and compensated at a premium rate, in accordance with national legislation and collective agreements. While a total working week, including overtime, should generally not exceed 60 hours, exceptions may be made only under extraordinary circumstances – such as unforeseen production peaks or emergencies – provided legal requirements, collective agreements, and health and safety protections are in place.

3.2.3 Stable and legal employment

Employment relationships must be legally recognized and comply with international conventions, national laws, and regulations. The use of short-term contracts, subcontracting, or other labor agreements must not be used to circumvent legal obligations related to wages, benefits, or job security.

All workers must receive a written employment contract in a language they understand, clearly outlining terms of employment. Apprenticeship programs must have predefined terms regarding duration, objectives, and conditions to ensure they provide genuine skill development opportunities.

3.3 Environmental & Societal Responsibility

3.3.1 Environment

Suppliers must take proactive measures to minimize negative environmental impacts across the value chain. This includes reducing pollution, optimizing resource use (energy, water, and materials), and limiting greenhouse gas emissions in production and transport. The local environment surrounding production sites must be protected from degradation.

Suppliers should conduct annual environmental risk assessments at its facilities to identify and mitigate potential risks. Compliance with national and international environmental laws, including obtaining necessary permits, is mandatory.

Continuous improvement in environmental performance is expected through monitoring, operational controls, and staff training. Suppliers should seek advancements based on scientific knowledge, technical feasibility, and economic viability.

3.3.2 Affected communities

Suppliers must ensure that their operations and use of natural resources do not harm local or marginalized communities or compromise their access to essential resources. This includes avoiding large-scale land claims, excessive water use, or other actions that could degrade the income base and livelihood of affected populations. Responsible and sustainable resource management practices must be implemented to prevent negative social impacts.

3.4 Ethical Business Practices

3.4.1 Anti-Bribery & Corruption

Suppliers must uphold the highest standards of integrity in all business interactions fully comply with all applicable anti-bribery and anti-corruption laws and regulations. Corruption in any form – including bribery, extortion, kickbacks, and improper benefits to business partners or government officials – is strictly prohibited. Suppliers must not offer gifts, entertainment, or any undue advantages to Håndverksgruppen's employees, agents, or representatives to influence business decisions.

3.4.2 Conflict of Interests

Suppliers must ensure that business decisions based solely on objective criteria, free from personal, financial, or other conflicts of interest. Any relationship that could improperly influence decision-making – including ties to relatives and other related parties – must be disclosed and avoided. Board members and employees of the supplier must behave impartially in all business dealings and refrain from providing undue advantages to individuals, companies or organizations.

3.4.3 Anti-Money Laundering and Terrorist Financing

Suppliers must comply with all applicable anti-money laundering (AML) and counter-terrorist financing (CTF) laws and ensure that they do not engage in any illicit financing activities. Business transactions must only be conducted with legitimate entities, and suppliers must implement measures to prevent illegal payments and financial transactions that could be used for money laundering. Suppliers must take reasonable steps to safeguard Håndverksgruppen and its subsidiaries from being misused for such purposes.

3.4.4 Compliance with national and international sanctions

Suppliers must adhere to all applicable national and international sanctions laws. If a supplier, its subcontractors, or any part of its supply chain becomes subject to sanctions or breaches sanctions laws, Håndverksgruppen must be informed immediately.

3.4.5 Supply Chain responsibility

Suppliers are expected to adopt a risk-based approach to managing their supply chain, conducting due diligence on their own suppliers and subcontractors to prevent human rights abuses,

environmental harm, and unethical business practices. Suppliers must ensure that their own supply chain complies with this code of conduct and take corrective action when necessary.

3.4.6 Fair Competition and Trade Compliance

Suppliers must comply with all applicable antitrust and competition laws, ensuring fair business practices and free competition. Anti-competitive behavior such as price-fixing, bid-rigging, market allocation and monopolistic practices is strictly prohibited. Suppliers must compete ethically, fostering a transparent and level playing field.

3.5 Product Integrity & Confidentiality

3.5.1 Product safety and quality

Håndverksgruppen expects its suppliers to uphold the highest standards of product safety and quality. All products supplied must comply with applicable legal and regulatory safety requirements, as well as relevant industry standards. Suppliers must implement rigorous quality control measures to ensure their products are safe, reliable, and fit for purpose.

3.5.2 Confidentiality and Data Protection

Suppliers must protect and respect the confidentiality of any non-public information related to Håndverksgruppen, its employees, customers, or business operations. Confidential information may only be used for its intended business purpose and must not be disclosed to third parties without prior authorization. Suppliers are also expected to comply with applicable data protection laws and ensure the secure handling of sensitive information.

3.5.3 Protection of property and assets

Suppliers must safeguard and responsibly use Håndverksgruppen's tangible and intangible assets, including materials, equipment, intellectual property, and financial resources. These assets must not be misused, lost, or used for personal gain. Any suspected misuse or loss must be reported promptly.

3.5.4 Accuracy of records

Suppliers must maintain accurate, transparent, and verifiable records of all business transactions. Financial and non-financial records must be documented in accordance with applicable laws and regulations. Any falsification, misrepresentation, or improper alteration of records is strictly prohibited.

4. Disciplinary Actions

Suppliers have access to Håndverksgruppen's whistleblower channel, available on the Group's website for each respective country, to report concerns about potential breaches of the Code confidentially and without fear of retaliation.

In the event of a breach of the Code, Håndverksgruppen and the supplier will work together to develop a corrective action plan with a clear timeline for remediation. The supplier must address the violation within a reasonable timeframe. If the supplier is unwilling to take corrective action or if there is a material breach of the Code, Håndverksgruppen reserves the right to terminate the supply contract.

Each Country MD is accountable for investigating potential breaches and determining appropriate actions in accordance with applicable policies and regulations in their respective country.

5. Roles & Responsibilities

Suppliers are required to adhere to the principles outlined in the Code, ensuring compliance with all expectations and standards detailed throughout this document.

The CHRO of Håndverksgruppen holds overall ownership of the Code, and in collaboration with the ESG Manager, oversees the annual review of and, where necessary, the updating of the Code to ensure it reflects current legal, regulatory, and ethical standards.

Each Country MD is responsible for the implementation and enforcement of the Code within their respective country. This includes ensuring that suppliers receive the Code, understand its requirements, and that key suppliers sign it.¹ The Country MD will be supported by relevant internal teams, such as Business Control, HR, ESG, to monitor and ensure ongoing compliance with the Code.

6. Exceptions

There are no exceptions to this document. Any need of exceptions to the Code must be clearly defined and documented. All exceptions shall be approved by the Board of Directors of Håndverksgruppen.

7. Monitoring & Review

Håndverksgruppen will evaluate suppliers' and business partners' adherence to the Code on an ongoing basis and as part of the overall assessment of new and existing business relationships. Where areas for improvement are identified, necessary updates will be made to maintain alignment with best practices.

To ensure its ongoing effectiveness, the CHRO and ESG Manager will review the Code on an annual basis and make any updates where relevant to ensure it remains aligned with industry standards, regulatory and legal requirements. The Code will be presented to the Board of Directors of Håndverksgruppen for approval on an annual basis.