## **Code of Conduct**

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# **SK**ΔKO



### **CODE OF CONDUCT**

At SKAKO A/S [hereinafter "SKAKO"] we are determined to meet all our customers, suppliers and shareholders as representatives of a responsible company with high ethical standards and integrity. Our customers', contractors' and owners' trust in us, together with our reputation, are among SKAKO's most valuable assets.

SKAKO therefore requires that our suppliers read, understand and adhere to SKAKO's Code of Conduct for Suppliers (hereinafter the "Code of Conduct") as amended from time to time. The Code of Conduct and changes hereof will be published at www.skako.com.

Our suppliers must continuously make sure that they comply with the applicable version of the Code of Conduct as amended from time to time. The purpose of this Code of Conduct is to ensure that our suppliers operate in accordance with internationally recognized minimum standards on human rights, labour rights, environment and anti-corruption. This Code of Conduct sets forth SKAKO's fundamental minimum requirements to suppliers.

The minimum requirements are based on the ten principles contained in the UN Global Compact including the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. As a minimum, SKAKO's suppliers must comply with all applicable national laws, regulations and other applicable standards and meet the requirements in this Code of Conduct. If there are differences between the terms of this Code of Conduct and applicable national laws, regulations or standards, the supplier must meet with the highest standards of requirements. If the said differences are detected, the supplier must immediately inform SKAKO.

Jens Wittrup Willumsen Chairman of the Board **Lionel Girieud** CEO - SKAKO A/S Thomas Pedersen CFO - SKAKO A/S

## **ENVIRONMENT**





## LABOUR

#### **Terms of employment**

 All employees have a written employment agreement, which includes information about the nature of work, working hours, salary and holidays.

#### **Child labour**

All our employees on permanent basis are over 18 years of age. In case of "youth employment" or "student work" the following rules apply:

- All young employees are over 13 years of age.
- Young employees between the ages of 13 and 15 only perform light work.
- Young employees between the ages of 13 and 15 work a maxi-mum of two hours per day.
- Parents of youth employees between the ages of 13 and 15 are informed of the work and the conditions under which the work is performed.
- Youth employees under the age of 18 do not perform dangerous work or work at night.
- All apprentices in the company are above the age of 15 and work as part of their education.

#### **Forced labour**

- Force, threats or disciplinary means are not used with the aim of forcing people to work.
- The company does not engage in debt slavery or trafficking of human beings with the aim of forcing people to work.
- The company does not cooperate with other companies which use forced labour or withhold identification papers or wages from employees with the aim of forcing the employees to work.
- Our employees are free to leave the workplace without being restrained.

#### **Working hours**

- The maximum weekly working time is 48 hours on average including overtime.
- The employee gets at least 11 consecutive hours of rest within every period of 24 hours.
- There is at least one day of rest per week.
- The employee has the right to a break in which he/she can leave the place of work if the working day is longer than 6 hours.
- Night workers do not work more than 8 hours on average within every period of 24 hours.
- Night workers are offered regular medical examinations and are offered other work as soon as possible if their health is compromised by the night work.
- Depending on exposure to risks, a regular medical check-up/doctor examination is conducted among workers (annually or every three years, depending on the case)
- The employee has the right to at least four weeks of holiday with pay.

#### Pay

- Salaries are paid on a regular basis and on time according to the employment agreement.
- All employees gain over the minimum pay in accordance with the law in the countries in which we work.
- Salaries for overtime are disbursed according to national laws.
- All employees have the right to holidays according to national laws and employment agreement.

#### **Discrimination**

- No person is subject to discrimination based on gender, race, colour, religion, political opinion, sexual orientation, national extraction, social origin, ethnic origin, age or handicap.
- Requirements for pregnancy tests from female employees or for HIV/AIDS tests cannot be made.
- No person is subject to discrimination in hiring, dismissal, transfer, promotion, wage setting, setting of working conditions or competency development. All decisions regarding employment, promotion, dismissal, wages and other working conditions are based on relevant and objective criteria.

#### **Freedom of association**

- We do not discriminate or in any other way make decisions that are affected by the employee's affiliation with a trade union or other association.
- We do not attempt to influence the employees to be members of a particular trade union.
- We do not interfere in which trade unions or other associations are formed in the workplace.
- Employees are not dismissed because of their affiliation with a trade union.
- A particular trade union is not favoured.

#### **Punishment**

 No employee may under any circumstances be exposed to bodily punishment or any other form of physical, sexual or psychological penalty, harassment or degradation.



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## **WORK ENVIRONMENT**

#### **Health and safety policy**

- The company engages in targeted and systematic efforts to continuously improve the work environment.
- The facilities comply with local legislation regarding health, safety, environment, and work conditions.
- One or more management representative has the responsibility for health, safety, welfare, and general facilities, as well as the creation and observance of written procedures.

#### Working conditions incl. accidents

- All steps in production are planned and organized with full consideration of health and safety concerns.
- If possible, risks are eliminated at the source.
- As far as possible, work is adapted to the individual employee in relation to the construction of the workplace and choice of work equipment as well as work and production methods.
- Monotonous and repetitive work is limited in order to minimize health effects of this work.

#### **Psychological working environment**

- The work in the company poses minimal risks to the deterioration of physical or psychological health.
- Monotonous, repetitive work, which may be hazardous to physical or psychological health in the short or long term, is avoided or limited.
- The workplace does not constitute a danger of deterioration of physical or psychological health in the short or long term.

- Isolated work, which may be hazardous to physical or psychological health, is avoided or limited.
- The work does not constitute a risk of deterioration of physical or psychological health as a result of bullying including sexual harassment.

#### **Dangerous substances**

- Employees' work with dangerous substances in the workplace - including manufacturing, storage, use and handling - takes place in a safe manner with minimized health risks. This means that a comprehensible guide to workplace use has been produced for each dangerous substance or material containing all necessary information (precautions, first aid, etc.)
- The guides are up-to-date and accessible to employees, and employees have been effectively trained in using the guides.
- All relevant employees have been trained in using the substance or material.
- The necessary first-aid equipment is available and ready for use.
- No children under 18 works with dangerous substances.

#### Safe buildings

 All buildings, facilities, areas, etc. to which company employees have access in the course of their work are designed, constructed and used in such a way that they are safe and without risks to the health of the employees.

- The workplace is designed in consideration of safety and health concerns, based on an assessment of the work environment conditions that may have an effect on physical or psychological health.
- The workplace is designed so that it is possible to escape and to rescue people in the event of fire and other accidents.

#### **Fire safety**

- The company has taken the necessary precautions and made the necessary plans regarding fire and evacuation of the employees.
- The company has selected and trained responsible people who will be in charge of emergency control and execution.
- There are a sufficient number of escape routes and emergency exits.
- Emergency exit doors and gates may be opened in an easy and safe manner, and there is free passage through them.
- There is free passage through escape routes.
- There are signs which provide information or warnings about conditions which are important to health and safety.
- In the event of a risk of particular danger situations, the workplace is equipped with the necessary alarm systems and first-aid equipment in case of accidents.
- A sufficient number of functional fire extinguishers have been installed.
- Flammable waste is secured in fire-proof containers which are emptied regularly.

#### **Employee training**

- The company's employees are trained in general health and safety. This means that:
- Regardless of nature and length of employment relation each of the company's employees has received adequate and suitable training and instruction in how to perform the work free of risks.
- The employees receive information on the risks of accident and disease that may be related to their work.
- The company pays the costs for training and instruction in how to perform the work free of risks.
- Training and instruction take place during work hours.

#### Accommodation

- Dormitories, where available, are safe and clean and separated from working facilities.
- Adequate toilet and shower facilities segregated between men and women are provided near the dormitories.
- There are appropriate dormitory rules for residents and guests, and appropriate measures are taken if the rules are violated.
- Employees can always enter and leave the dormitory freely.

#### Food

- Canteens, where available, are clean, hygienic, and well-lit.
- Food handling is safe and hygienic, and food handlers are correctly trained in food preparation hygiene. The food served meets generally recognized nutritional requirements.

## **ANTI-CORRUPTION**

- None of the company's employees give or receive unjustified advantages from local or foreign public officials or employees in private companies.
- No form of extortion, bribery or favouritism to or from employees or organizations will be tolerated.

## **ETHICS AND PROFESSIONAL CONDUCT**

- Employees/Vounteers must not perform their work, undertake work-related activities nor represent the company in SKAKO-related affairs and events if they are impaired by alcohol or other drugs.
- Employees/Vounteers have an obligation to behave and dress appropriately when representing SKAKO in any business related matter.

## **FOLLOW-UP AND COMPLIANCE**

- Implementation of this Code of Conduct is the supplier's responsibility. However, SKAKO may carry through announced or unannounced inspections by itself or by third party.
- Full or partial neglect of the principles in this Code of Conduct or serious violation of local laws and regulations may, in its extreme, cause an interruption of the cooperation with SKAKO.







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