

A top-down photograph of a white desk. On the right, a silver laptop is open. In the center, two pairs of hands are clasped together. One person is wearing a light blue watch. In the top left corner, there is a small green succulent in a pot. The background is a plain white wall.

# Code of Conduct for Suppliers

Insatech's Code of Conduct for Suppliers summarises the ethical values that Insatech believes should apply in the relationships with all our suppliers of products and services. The code is based on the UN's Global Compact, the ILO's core conventions, the OECD's guidelines for multinational companies, competition legislation and anti-corruption regulations.

This Code of Conduct has been adopted by the Board of Directors of Insatech and any amendments or dispensations may only be executed by the Board.

March 2023

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# Code of Conduct

## 1. General Principles

Insatech's ambition is to work together with our suppliers and to review them regularly in order to achieve positive change. All suppliers must respect the Code of Conduct and draw up a code of conduct of their own, the content of which does not conflict with the values that Insatech represents. Insatech chooses suppliers primarily on the basis of two criteria:

- the ability to deliver services and products in a businesslike manner, and
- the ability to comply with the standards of this Code of Conduct for Suppliers.

### 1.1. Compliance with applicable legislation

In its activities, the supplier must be aware of, and as a minimum requirement, comply with all national and international laws and regulations that apply in the countries where they operate. The supplier shall always comply with the highest requirements arising from either applicable legislation or this Code of Conduct.

## 2. Human Rights

Anyone who works for a supplier either directly or indirectly must be entitled to have their basic human rights respected in line with the EU's Universal Declaration of Human Rights.

### 2.1. Work environment

The supplier must, as a minimum requirement, comply with applicable legislation and regulations relating to the work environment and working conditions. The supplier must provide a safe, hygienic and healthy workplace. This means, but is not restricted to, the following being in place: fire safety, evacuation plan, safety equipment and procedures, access to clean toilets and drinking water, adequate accident insurance for all employees, first-aid equipment, and that employees be properly trained to be able to use machines, equipment and chemical substances in a correct and safe manner.

### 2.2. Working conditions

The supplier must apply working hours and pay salaries and compensation for overtime at least in accordance with national legislation and agreements, or in accordance with the custom of the local trade. The supplier must at least offer its employees all legislated benefits, including pension and holiday entitlements.

### 2.3. Child labour

Our suppliers must comply with the UN Convention on the Rights of the Child, the ILO's Minimum Age Convention (no. 138) concerning Minimum Age for Admission to Employment, and the ILO's convention (no. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

No individual may be employed who is below the age of having completed compulsory education or is below the age of 15. The supplier must have documentation in place that certifies the age of all employees. If we should come across child labour at any of our suppliers, we require that action is taken to correct the problem without worsening the child's social situation.

### 2.4. Disciplinary measures

Employees must be treated with dignity and respect. No employee may under any circumstances be subjected to corporal punishment or other forms of physical, sexual or psychological punitive action, harassment or force. Salary deductions may not be imposed as a disciplinary sanction, unless this is regulated by collective agreement or approved by law.

## **2.5. Discrimination**

At Insatech we strive for a non-discriminating company culture based on responsibility and respect. We will therefore not permit discrimination or harassment in any form by our suppliers.

## **2.6. Freedom of association**

Employees enjoy freedom of association at all levels. Suppliers may not prevent employees from joining associations or organisations or negotiating collectively.

## **2.7. Threats and harassment**

Suppliers must not subject employees to threats or harassment, or in any other way restrict or interfere with employees' legal and peaceful exercising of their rights.

## **2.8. Forced labour**

We do not accept forced labour, slave labour or involuntary or unremunerated work in any form. This includes contracts under forced conditions and illegal employees. All work that is carried out must be based on a recognised employment relationship in line with what has been established by local legislation. Employees must be free to end their employment at any time in accordance with the agreed notice period without sanction or salary deduction.

Neither do we accept methods that restrict employees' freedom of movement, and no individual may be kept at work for any length of time against their will. The supplier must have procedures and methods for minimising the risks of all kinds of forced labour and human trafficking.

# **3. Business Ethics**

The supplier must run its operation in an ethical manner and comply with international trading regulations and regulations concerning export controls. The supplier must implement procedures to promote transparency and guarantee that no document relating to the supplier's performance in line with this Code of Conduct can be manipulated. The supplier must respect intellectual property rights and protect confidential information from theft, fraud and inappropriate disclosure.

## **3.1. Anti-corruption standards**

We do not accept any supplier unduly attempting to influence decision makers at Insatech, other suppliers, buyers and/or representatives of government authorities/the public sector, etc., or in any other way taking or neglecting to take action that may conflict with legislation applicable at the time concerning corruption, bribery, extortion or embezzlement. Suppliers may never offer or receive any favours or other funds that might be considered undue benefits.

## **3.2. Conflict zones**

The supplier must ensure that no business that we do in any way supports war, conflict, money laundering, trade with illegal weapon, drug trade or slave trade. This includes the use of conflict minerals.

## **3.3. Impartiality and conflicts of interest**

Suppliers must avoid conflicts of interest that can jeopardise the supplier's trustworthiness and must inform Insatech of any potential conflicts of interest.

## **3.4. Healthy competition**

No supplier to Insatech may be involved in any kind of price fixing or market sharing between competitors, resale price maintenance, hampering of innovation, or other anti-competitive activities that conflict with applicable competition regulations.

## 4. Environment

Suppliers must comply with applicable environmental legislation in the country where they conduct their activities and must manage their activities in a responsible way as regards the risks of environmental impact.

Suppliers must comply with applicable regulations regarding air pollution, hazardous waste, discharge of water, chemical storage, recycling of waste and waste management controls. They must also take reasonable action to reduce their direct and indirect negative impact on the environment and continuously monitor improvement objectives.

We encourage our suppliers to have a documented Environmental Management System (EMS) in place in order to manage the organisation's procedures and production processes in a comprehensive and documented manner, specifically adhering to environmental regulations.

Suppliers must obtain and retain all necessary permits and licences for their activities, and must inform Insatech of any significant incidents, how the supplier is going to manage the situation and how it intends to prevent similar incidents from happening in the future.

### 4.1. Hazardous substances management and regulations

The supplier must comply with all national laws and regulations prohibiting or restricting specific substances. The supplier shall for example comply with material restrictions (e.g. REACH) and continuously maintain records of relevant raw material declarations such as Material Data Sheets (MDS) or similar.

The supplier must have systems and routines in place in order to monitor safe handling of chemicals in operations, reporting and disclosures for conflict minerals, handling and disposing of hazardous waste, emergency routines to prevent and minimize effects on health and environment.

### 4.2. Wastewater, solid waste and air emissions

Wastewater and solid waste generated from operations, industrial process and sanitation facilities must be treated as required by applicable laws and regulations before discharge and disposal.

Air emissions of for example, volatile organic chemicals, aerosols, corrosive, particles and combustion by products generated from operations must be treated as required by applicable laws and regulations before discharge.

### 4.3. Emission of greenhouse gases

Insatech encourage all suppliers to reduce their impact on the climate and to set greenhouse gases reduction targets for their own operation. Insatech has the long-term ambition to reach a coal free supply chain.

## 5. Implementation and Compliance

The Code of Conduct applies to all suppliers to Insatech.

Insatech retains the right themselves or via a third party to carry out a review or inspection at our own expense and with reasonable notice to check that the standards stated in this Code of Conduct are being complied with. The supplier must keep a register of all relevant documents and must be able to account for how it is complying with Insatech's Code of Conduct for Suppliers.

If a supplier infringes the Code of Conduct and does not carry out the prescribed improvements within an agreed period of time, although a complaint has been registered and a plan of action has been agreed, we will discontinue our business relationship with the supplier. Such measures do not preclude Insatech from instituting legal proceedings.

We encourage partners to report relationships that may conflict with the Code of Conduct for Suppliers. Addtech is providing an anonymous whistle-blower system open for partners. More information is available at [www.addtech.com/whistleblower](http://www.addtech.com/whistleblower) (Insatech is part of the Addtech Group).

## 6. Zero-tolerance standards

Insatech will not conduct business with a supplier engaged in violations of fundamental human rights. The following practices are considered unacceptable:

- The use of bonded and forced labour, including forced prison labour and human trafficking.
- Any violation of the ILO convention 182 Worst form of child labour.
- Any harsh, inhumane or degrading treatment or punishment of employees.
- The exposure of employees to life-threatening work environments, where they have not been informed of the danger and where protective measures have not been undertaken.
- Deliberately causing substantial pollution to air and water or soil contamination.
- Any complicity in violations of international humanitarian law and other crimes against the human person as defined by international law.

### Code of Conduct for Suppliers - compliance commitment

We hereby confirm we have received, read, and understood the content of Insatech Code of Conduct for Suppliers. We take the responsibility to ensure compliance and to inform concerned employees about the content of this code.

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Name (in block letters) and title

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Signature

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Company Name

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Date

Please return to [Merete.Kristensen@insatech.com](mailto:Merete.Kristensen@insatech.com)