

Vangby Code of Conduct

Our company is committed to sustainability. This includes respect for universally recognised principles on human rights, labour rights, the environment and anti-corruption.

Therefore, we seek to ensure that our own company and our collaborators operate in accordance with the requirements of this Code of Conduct.

The Code of Conduct should be understood as a tool for cooperation and dialogue with our collaborators about improving systems to manage adverse impacts on human rights including labour rights, the environment and anti-corruption.

In case of non-compliance with requirements in our Code of Conduct, we will focus on collaborators' ability and willingness to demonstrate continuous improvements. We feel confident that cooperation and dialogue will result in a more efficient partnership, which both parties will benefit from.

Please refer to the Code of Conduct for more information about the specific requirements. If you have any questions regarding our Code of Conduct or our company in general, please do not hesitate to contact us.

Kind regards,

Vangby A/S
and
Vangby Sweden AB

Jakob Vangby
CEO

I. Introduction

Purpose of the Code of Conduct

The purpose of this Code of Conduct is to ensure that our collaborators operate in accordance with internationally recognised minimum standards on human rights, labour rights, the environment and anti-corruption. Vangby therefore expects collaborators to address adverse impacts on these minimum standards.

Vangby adheres to the content of this Code and expects the same of its collaborators. Compliance with the requirements of this Code is therefore a condition of any agreement or contract between Vangby and our collaborators.

The aim of this Code is not to cease the business relationship between Vangby and our collaborators if non-compliance were to be identified, but to help improve the overall human rights and the business behaviour in general. Vangby will not conduct business with a collaborator if compliance with the terms of this Code is deemed impossible and the collaborator shows no willingness or ability to mitigate identified adverse impacts.

Vangby will periodically review the adequacy and continuing effectiveness of this Code.

General Principles

This Code is not and should not be interpreted as a mean to circumvent or undermine national laws or national labour inspectorates. Similarly, this Code is not and should not be interpreted as a substitute for free trade unions, nor should it be used as a substitute for collective bargaining.

This Code outlines necessary processes and minimum standards. Vangby will not accept any attempt to use the requirements as a mean to lower existing standards. When implementing this Code, collaborators shall take all necessary measures to ensure that they do not unintentionally leave workers and other beneficiaries in a worse position than before this Code was introduced.

We are committed to ethical trading and expect all collaborators to operate to high ethical standards. Collaborators must conduct all business dealings with utmost discretion, honesty, integrity and respect for all parties.

Collaborators must have appropriate procedures in place to prevent unauthorised disclosure of confidential information about Vangby. Any information shared by Vangby should only be used for its intended purpose.

International Principles and Legal Compliance

The provisions as set forth in this Code establish minimum requirements to collaborators. These minimum requirements are based on the ten general principles contained in the UN Global Compact as made operational with the UN Guiding Principles on Business and Human Rights. The minimum requirements are made in consideration of the International Bill of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption. Furthermore, the Code rests on the OECD Guidelines for Multinational Enterprises, 2011 Edition.

Collaborators must observe the requirements of the EU General Data Protection Regulation and any other data protection law or regulation from time to time.

In addition to meeting the minimum requirements of this Code and thereby act in consideration of relevant international agreements, principles, objectives and standards, collaborators shall comply with all laws, regulations, administrative practices and other applicable standards (e.g. collective bargaining agreements or other Codes of Conduct) in the countries in which they operate.

Where there are differences between the terms of this Code and national laws or other applicable standards, collaborators shall adhere to the higher requirements.

II. Principles and Standards in the Code of Conduct

The principles and standards that Vangby expects all collaborators to manage adverse impacts upon are described in the three sub-sections below.

Human rights including labour rights

Collaborators are expected to manage adverse impacts on internationally recognised human rights including labour rights as stated in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. This also includes managing adverse impacts on consumers, as stated in the OECD Guidelines on Multinational Principles' chapter on Consumer Interests.

We take the issue of human rights seriously and continue to strengthen our policies and management systems in this area. Collaborators must mirror our zero tolerance for slavery, human trafficking, child labour and be committed to tackling modern slavery.

Collaborators must prohibit any form of abuse or intimidation including physical abuse or discipline, threat of physical abuse, sexual or other harassment and verbal abuse.

We do not tolerate discrimination based on race, caste, national origin, religion, disability, gender, marital status, sexual orientation, union membership or political affiliation and expect the same of our collaborators.

Collaborators must ensure that their employment policies comply with local law including restrictions on maximum working hours and voluntary overtime. Wages and benefits paid must meet, at a minimum, national legal standards or industry standards, whichever is higher.

All employees must be provided with a written and understandable contract of employment.

Collaborators must respect freedom of association and the right to collective bargaining. Workers, without distinction, must have the right to join or form trade unions of their own choosing.

We recognise that the success of our business is dependent upon the health and wellbeing of our colleagues and collaborators must provide a safe and healthy working environment and are committed to continual improvement to minimize the risk of workplace incidents.

Sustainability and Environmental principles

Sustainability considerations are an important element in the execution of our strategy and decision making. Vangby expects collaborators to contribute to global sustainability to the best of their abilities, and favour collaborators who operate in a socially and environmentally responsible manner.

Collaborators must show commitment to achieving long term sustainability by managing and developing operations and sale of products, without compromising the quality of life for future generations.

Collaborators are expected to establish adequate processes to manage all significant potential and actual impacts on the external environment and support the principles in the Rio Declaration on Environment and Development. These principles are further described in the UN action plan Agenda 21. This corresponds to the environmental principles described in the OECD Guidelines for multinational enterprises.

Money Laundering and Anti-corruption principles

Vangby is committed not to engage in any corruption or bribery and reciprocally requires the same from all collaborators. No collaborator may give or offer to give, directly or indirectly, to any Vangby representative any illicit payment or other consideration for the purpose to obtain or retain direct business or to secure other improper advantages. No payments, gifts or other kinds of reimbursement shall be asked or accepted from any third party that could affect or appear to affect the objectivity in decisions.

Collaborators should establish adequate processes to counter corrupt practices. Such processes should support and be in line with the United Nations Convention against Corruption.

Furthermore, the collaborator shall not accept, facilitate or support money laundering.

III. Implementation of the Code of Conduct

Records and Documentation

Collaborators shall maintain appropriate records and/or guidelines to demonstrate compliance with the requirements of this Code. Records shall be available to Vangby upon request.

Scope of Application

The requirements of this Code extend to all Vangbys' collaborators and all their workers, regardless of their status or relationship with the collaborator. This Code therefore also applies to workers who are engaged informally, on short-term contracts, or on a part-time basis.

Collaborators are responsible for ensuring that their business relationships including their sub-suppliers also have adequate processes to manage their adverse impacts on human rights including labour rights, environmental and anti-corruption principles in place. This includes sub-suppliers classified as home-based workers or small farmers.

As part of this obligation, a collaborator shall:

- Require sub-suppliers to inform the collaborator about other business entities in the supply chain taking part in the production of each order.
- Use its leverage to make sub-suppliers work towards meeting the requirements of this Code.
- Undertake reasonable efforts to check that sub-suppliers operate in conformance with this Code.



Continuous collaboration

If Vangby suspect that a collaborator has contravened this Code of Conduct, we reserve the right to monitor the operations of collaborators with the purpose of gaining insight into how collaborators manage their impacts on human rights including labour rights, environmental and anti-corruption principles.

Vangby expects all collaborators at any time to be able to declare in writing its stage of implementation in relation to the requirements contained in this Code. Collaborators are expected at any point to willingly cooperate in answering further questions, self-assessments and if deemed necessary cooperate with Vangby in improving systems to manage adverse impacts on human rights including labour rights, environmental and anti-corruption principles.

Collaborators shall accommodate visits from Vangby. This includes providing physical access to any representative from Vangby or assigned by our company. Vangby reserves the right to let an independent third party of our choice make on-site inspections to verify compliance with the requirements of this Code.

Where instances of non-compliance are detected, Collaborators will be given a fixed period of time to self-correct the deficiency. In the event of repeated and serious breaches of the requirements of this Code, Vangby reserves the right to cease business relationships with its collaborators and possibly cancel any production or delivery in progress. Collaborators who violate or is anticipated to violate this Code may be subject to immediate termination of business agreement and potential legal action.