



DALEMA

Supplier Code of Conduct

Purpose

At Dalema, we are committed to promoting decent working and environmental standards throughout our supply chains. We acknowledge the diverse legal frameworks, cultures, norms, and traditions of the countries we operate in and respect these unique attributes. Nonetheless, we remain steadfast in collaborating with our suppliers and business partners to drive continuous improvement in working conditions and minimize environmental impact, going beyond legal compliance.

To support this commitment, we have developed this Code of Conduct, which outlines our expectations of suppliers and business partners.

Dalema aims to continuously improve policy and practice that supports suppliers in complying with this code of conduct.

Principles

Dalema's suppliers are to supply goods and services that are produced in compliance with the code of conduct. Our Supplier Code of Conduct sets out minimum standards Dalema expects its supply chain partners to uphold in relation to their employees and the environment.

Dalema's Ethical Trade Principles are founded on key UN and International Labour Organization conventions and documents. National laws shall be respected, and where the

provisions of law and Dalema's ethical trade principles address the same subject, the most stringent shall apply.

Suppliers shall have an adequate management system to document and monitor the product quality as well as other business processes. OECDs Due Diligence Guidance for Responsible Business Conduct provides a recommended framework. This involves risk assessments to identify potential negative impact, to stop and prevent such impact and to monitor and evaluate the effect of the measures put in place.

Suppliers must ensure that their own subcontractors also comply with these standards, including all subcontractors backwards in the contractual chain. This also applies to any contract workers, day workers and casual workers of the suppliers and subcontractors.

A supplier must be able to document compliance with the code of conduct at Dalema's request. This is achieved by registering to Dalema's supplier portal and promptly responding to due diligence assessments or similar requests for information regarding its operations, and/or follow-up meetings and inspections of the working conditions at production sites. The supplier will be obliged to name and provide contact information for any sub-supplier that Dalema wishes to inspect.

In the event of a breach of the code of conduct, Dalema and the supplier will jointly prepare a plan for remedying the breach. Remediation

must take place within a reasonable period of time. The contract will only be terminated if the supplier remains unwilling to remedy the breach following repeated enquiries. When selecting new suppliers, emphasis will be given to social and environmental standards.

Minimum Standards

1. Freely Chosen Employment

ILO Conventions Nos. 29 and 105

- 1.1. There shall be no forced, bonded or involuntary prison labour.
- 1.2. Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.
- 1.3. Workers' agreements to the terms and conditions of recruitment and employment should be voluntary and free from deception or coercion.
- 1.4. No recruitment fees or related costs should be charged to, or otherwise borne by, workers or jobseekers.

2. Freedom of Association and the Right to Collective Bargaining

ILO Conventions Nos. 87, 98, 135 and 154

- 2.1. Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.
- 2.2. Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.
- 2.3. Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

3. No Child Labour

UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146

- 3.1. The minimum age for workers shall not be less than 15 and comply with
 - i. the national minimum age for employment, or;

- ii. the age of completion of compulsory education

whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.

- 3.2. There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.
- 3.3. No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.
- 3.4. Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

4. No Discrimination

ILO Conventions Nos. 100 and 111 and the UN Convention on Elimination of all forms of Discrimination Against Women

- 4.1. There shall be no discrimination in the workplace regarding hiring, compensation, access to training, promotion, termination, or retirement based on ethnicity, caste, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation.
- 4.2. Employers must implement measures to protect workers from sexually intrusive, threatening, insulting, or exploitative behaviour. Workers must also be safeguarded from discrimination or termination of employment on unjustifiable grounds, such as marriage, pregnancy, parenthood, or HIV status.

5. Harsh or Inhumane Treatment

- 5.1. Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

6. Occupational Health and Safety

ILO Convention No. 155 and ILO Recommendation No. 164

6.1. The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

6.2. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

6.3. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

6.4. Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.

7. Adequate Wages

ILO Convention No. 131

7.1. Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.

7.2. All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

7.3. Deductions from wages not provided for by national law shall not be permitted without the express permission of the worker concerned.

8. Decent Working Hours

ILO Convention No. 1 and 14

8.1. Working hours shall comply with national laws and benchmark industry

standards, and not more than prevailing international standards. Weekly working hours should not on a regular basis be more than 48 hours.

8.2. Workers shall be provided with at least one day off for every 7-day period.

8.3. Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e. that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when:

- this is allowed by national law;
- regulated by a collective bargaining agreement
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

8.4. Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), minimum in accordance with relevant legislation.

9. Providing Regular Employment

9.1. Employers must not circumvent their obligations to employees under international conventions, national laws, and regulations related to regular employment by relying on short-term arrangements, such as contract labor, casual labor, day labor, subcontracting, or other alternative labor relationships.

9.2. All workers are entitled to a contract of employment in a language they understand.

9.3. The duration and content of apprenticeship programmes shall be clearly defined.

10. Marginalized Populations

10.1. Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land

areas, use of water or other natural resources on which these populations are dependent.

under schemes like the Forest Stewardship Council (FSC).

11. Environment

11.1. Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimizing pollution, promoting an efficient and sustainable use of resources, including energy and water, and minimizing greenhouse gas emissions in production and transport. The local environment at the production site shall not be exploited or degraded.

11.2. National and international environmental legislation and regulations shall be respected, and relevant discharge permits obtained.

11.3. Hazardous chemicals and other harmful substances shall be carefully managed.

11.4. To comply with Regulation on Deforestation-Free Products (Regulation (EU) 2023/1115), suppliers must ensure the legality of their production and supplies and ensure that controlled products does not come from:

- Deforested areas (land subject to deforestation after 31st of December 2020)
- High Conservation Value Forests¹ (HCVFs),
- Illegally harvested timber (timber harvested in violation of applicable laws in the country of origin)
- Genetically Modified trees – unless genetic modification are legally permitted and certified and allows to modify tree characteristics by inserting in their genes, genetic material from another tree of the same or another species, or from another living organism.
- Species listed by the International Union for Conservation of Nature (IUCN) as Vulnerable (VU), Endangered (EN), or Critically Endangered (CR), or species listed by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), unless certified

12. Corruption

12.1. Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers, or employees of any such party or government officials.

12.2 Suppliers are expected to implement a due diligence system to provide evidence of compliance, including collecting geographical coordinates of the land where the commodities were produced, in accordance with Regulation on Deforestation-Free Products (Regulation (EU) 2023/1115).

13. Animal Welfare

13.1. When manufacturing products stemming from animals, considerations to animal welfare shall be taken in the entire value chain, in accordance with national and international regulation.

13.2. No endangered and vulnerable species, as defined by CITES (Convention on International Trade in Endangered Species), and the IUCN (International Union of Conservation of Nature) Red list of Critically endangered; Endangered; or Vulnerable listed species, shall be used in the production of goods.

Dalema Group

Tor Henrik Knutsen
CEO

¹ As defined by the HCV Resource Network
<http://www.hcvnetwork.org/>

The supplier hereby commits to full compliance with the Dalema Group Supplier Code of Conduct in all aspects of its operations and undertakes to ensure that its sub-suppliers adhere to the same standards.

Place and date
Supplier name/stamp
Signature supplier