

Business Partner Code of Conduct

Our Shared Commitment

For the Dacke Industri Group to grow responsibly, create lasting value, and contribute positively to society, it is essential that the companies and individuals we work with share our values and approach to doing business. As a supplier or sub-contractor of the Dacke Industri Group, you are expected to act with consistency and integrity, take responsibility for your sustainability impact, and show respect for people, relationships, and the environment.

We believe that responsible business is rooted in integrity, sound judgement, and accountability. These principles define the culture that we seek to build and shape how the Dacke Industri Group is experienced by employees, partners, and the wider community. As a supplier or sub-contractor, you play an important role in upholding these values through your decisions and actions.

This Business Partner Code of Conduct (the "**Code**") currently applies to our suppliers and sub-contractors and sets out the ethical principles and standards that you are expected to observe in your interactions with the Dacke Industri Group.

The Code complements applicable laws and regulations. Where differences arise between local law and the Code, the stricter requirement applies. The Dacke Industri Group operates with decentralised leadership and local responsibility, and we expect you to apply the same principles of professionalism, sound judgement, and personal integrity as we do. By entering into a business relationship with us, you commit to these principles.

Business Integrity and Ethics

Within the Dacke Industri Group, we conduct our business honestly, responsibly, and with respect for fair and open markets. We expect the same standards from our business partners.

Legal Compliance and Ethical Standards Compliance with the law is the baseline from which all other expectations in this Code are built. As our business partner, you must at all times conduct your operations in full accordance with all applicable laws, regulations, and regulatory requirements in the jurisdictions where you operate.

Where the requirements of applicable law conflict with the standards set out in this Code, the stricter standard shall apply. Where local laws or regulations fall below internationally recognised standards, including those established by the ILO, the UN, or other relevant international bodies, you are encouraged to apply the higher standard in any event.

Anti-Corruption As our business partner, you must never engage in, facilitate, or tolerate bribery, extortion, kickbacks, or embezzlement in any form. This prohibition applies regardless

of whether the conduct involves public officials or private individuals, and regardless of local custom or practice. No undue advantage, whether in the form of money, gifts, hospitality, or any other benefit, may be offered, promised, given, or accepted with the intent of influencing a business decision or obtaining an improper benefit.

Conflicts of Interest As our business partner, you must take reasonable steps to identify and avoid situations in which personal, financial, or other interests could compromise your objectivity or loyalty in your relationship with us. Where a potential conflict arises or cannot be avoided, it must be disclosed to us promptly so that it can be appropriately managed.

Fair Competition You must comply with all applicable competition and antitrust laws in the markets where you operate. This means refraining from agreements or practices that restrict competition, including price-fixing, market allocation, bid-rigging, or the abuse of a dominant market position. You must never engage in conduct that could expose the Dacke Industri Group to competition law risk.

Financial Compliance You are expected to maintain accurate and transparent financial records and to meet all applicable tax obligations in the jurisdictions where you operate. As our business partner, you must have adequate controls in place to prevent your operations from being used for money laundering or other financial crime, and must comply with all applicable anti-money laundering (AML) requirements. You must also comply with international sanctions regimes and export control regulations, and must not engage in any transaction that involves a sanctioned party or destination.

Data Protection and Confidentiality As our business partner, you must handle any personal data processed in connection with their relationship with the Dacke Industri Group in accordance with applicable data protection laws. Confidential information and trade secrets belonging to the Dacke Industri Group must be protected and used only for the purposes for which they were shared. You must respect the Group's intellectual property rights and must not use, copy, or disclose them without authorisation.

Responsible Use of Technology and AI Where you deploy artificial intelligence or other automated technologies in the delivery of products or services to us, you are expected to do so responsibly and transparently. This includes ensuring that such technologies are developed and used in a manner that is free from unlawful bias, respects applicable legal and ethical standards, and does not compromise the integrity or security of the Group's data or systems.

In short - what this means for you:

- Always act honestly and in accordance with the law; in every country and every situation.
- Do not offer, accept, or facilitate any form of bribe, kickback, or improper payment, regardless of local practice or business custom.
- Disclose any situation where your personal or financial interests could conflict with your obligations to the Dacke Industri Group.
- Compete fairly and ensure that your business practices comply with competition law in all markets where you operate.
- Keep accurate financial records, meet your tax obligations, and ensure that your operations cannot be used for money laundering or sanctions evasion.

- Protect any confidential information or intellectual property shared with you by the Dacke Industri Group and use it only for agreed purposes.
- If you use AI or automated tools in your work with us, ensure that they are used responsibly, transparently, and in accordance with applicable legal and ethical standards.

Human Rights and Labour Standards

People are at the heart of our value chain. We are committed to respecting human rights and promoting fair and safe working conditions in our operations. We expect our business partners to uphold the same commitment in their own operations.

Prohibition of Forced and Child Labour As our business partner, you must not engage in, facilitate, or benefit from any form of modern slavery, forced labour, bonded labour, or human trafficking. Child labour is strictly prohibited. You must not employ individuals below the applicable minimum working age under local law or, where no such law exists, below the age defined by relevant ILO conventions. Workers must never be required to surrender identity documents, pay recruitment fees, or enter into any arrangement that restricts their freedom to leave employment of their own accord.

Fair Treatment and Non-Discrimination All workers must be treated with dignity and respect. Discrimination, harassment, bullying, or any other form of abusive conduct in the workplace is not acceptable. As our business partner, you must ensure equal opportunities in recruitment, remuneration, training, and career development, regardless of ethnicity, gender, age, disability, sexual orientation, religion, nationality, or any other protected characteristic. Employees must have access to fair and confidential mechanisms for raising grievances without fear of retaliation.

Compensation and Working Hours You must ensure that all workers receive remuneration that meets or exceeds applicable statutory minimum wage requirements or relevant industry standards, whichever is higher. Wages must be paid regularly, in full, and in a transparent manner. Working hours must comply with applicable laws and must not exceed levels that compromise the health, safety, or well-being of workers. Adequate rest periods and, where applicable, overtime compensation must be provided.

Freedom of Association and Collective Bargaining As our business partner, you must respect the right of all workers to form or join trade unions, engage in collective bargaining, and participate in peaceful assembly, in accordance with applicable law. Workers must not be penalised, intimidated, or disadvantaged for exercising these rights. Where freedom of association is restricted under local law, business partners are encouraged to support alternative means by which workers can raise concerns and be represented.

Health and Safety You must provide a safe, healthy, and hygienic working environment for all your workers. This includes identifying and mitigating workplace hazards, providing appropriate personal protective equipment at no cost to the worker, and delivering comprehensive health and safety training. You must maintain emergency preparedness procedures and must comply

with all applicable health and safety laws and regulations. Workers must be able to raise safety concerns without fear of adverse consequences.

In short - what this means for you:

- Ensure that your workforce is free from any form of forced labour, bonded labour, or child labour, and that no worker is subject to recruitment fees or document retention.
- Treat all workers with dignity and provide equal opportunities regardless of personal characteristics such as gender, ethnicity, age, or disability.
- Pay at least the applicable minimum wage, ensure that working hours are lawful and reasonable, and provide adequate rest periods.
- Respect workers' rights to organise, join a union, and engage in collective bargaining without interference or retaliation.
- Maintain a safe and healthy workplace, provide necessary protective equipment, and ensure that workers can raise safety concerns without fear.
- Apply these standards not only within your own organisation but across your supply chain, and be prepared to demonstrate compliance upon request.

Environmental Stewardship

Within the Dacke Industri Group, we are committed to reducing our environmental impact and to conducting business in a manner that is sustainable for future generations. We expect our business partners to share this responsibility and to take meaningful steps to manage and minimise their environmental footprint across their own operations and supply chains.

Regulatory Compliance As our business partner, you must obtain and maintain all environmental permits, licences, and authorisations required under applicable law. You must comply with all relevant environmental legislation and regulations in the jurisdictions where you operate, including those governing emissions, waste, water use, and hazardous substances. Where regulatory requirements fall below internationally recognised standards, you are encouraged to apply the higher standard.

Climate and Emissions You are expected to actively identify and minimise greenhouse gas emissions and other pollutants arising from your operations. This includes emissions to air, discharges to water, and contamination of soil. We encourage our business partners to set measurable targets for reducing their greenhouse gas emissions, to track progress against those targets, and to report transparently on their climate-related performance. You should also consider the climate impact of your own supply chain and work to reduce emissions across your value chain where possible.

Circular Economy and Waste You should seek to minimise waste at every stage of your operations by prioritising the reduction, reuse, and recycling of materials. Where waste cannot be avoided, it must be managed and disposed of responsibly and in accordance with applicable law. You are encouraged to design products and processes with circularity in mind, extending the useful life of materials and reducing reliance on virgin resources.

Nature and Biodiversity Protection You must not engage in or facilitate activities that contribute to unlawful deforestation, the degradation of protected natural areas, or the irreversible conversion of natural ecosystems. Where operations have the potential to affect biodiversity or sensitive habitats, you are expected to assess and mitigate those impacts. We encourage our business partners to support efforts to protect and restore natural ecosystems wherever possible.

In short – what this means for you:

- Maintain all required environmental permits and licences and comply with applicable environmental laws and regulations at all times.
- Actively work to reduce greenhouse gas emissions and other forms of pollution arising from your operations, and consider setting formal, measurable targets for doing so.
- Minimise waste by prioritising reduction, reuse, and recycling, and ensure that any waste generated is disposed of lawfully and responsibly.
- Avoid any activities that contribute to unlawful deforestation or the destruction of natural ecosystems, and assess the environmental impact of your operations on biodiversity.
- Be prepared to share information about your environmental performance and progress with the Dacke Industri Group upon request.
- Encourage and, where possible, require similar environmental standards from your own suppliers and subcontractors.

Compliance and Collaboration

We believe in continuous improvement and in building long-term, collaborative relationships with our business partners. We recognise that meeting the standards set out in this Code is an ongoing process, and we are committed to working constructively with our business partners to help them achieve and maintain compliance.

Risk Assessment and Management You are expected to take a proactive approach to identifying and managing risks within your own operations and supply chain. This includes regularly assessing risks related to legal compliance, human rights, labour standards, environmental impact, and business ethics. Where risks are identified, you should take timely and proportionate steps to address them and should be prepared to share relevant findings with the Dacke Industri Group upon request.

Verification and Audits We reserve the right to verify compliance with this Code through a range of means, including self-assessment questionnaires, document reviews, third-party audits, and site visits. Site visits may be conducted with or without prior notice. You are expected to cooperate fully with any such verification activities and to provide accurate and complete information. The costs of routine compliance verification will generally be borne by the Dacke Industri Group, though you may be required to bear costs where a serious breach is identified.

Remediation Where non-compliance with this Code is identified, whether through internal review, an audit, or any other means, you must engage constructively and promptly to address the issue. We will work collaboratively with you to support remediation wherever possible.

Termination Whilst we strongly prefer a collaborative approach to resolving compliance concerns, we reserve the right to suspend or terminate our relationship with you in the event of a serious or material breach of this Code. Examples of conduct that may lead to immediate termination include, but are not limited to, engaging in bribery, corruption, fraud, or other criminal conduct; the use of forced or child labour; serious violations of human rights; significant environmental harm; or an unwillingness to acknowledge and address identified issues in good faith. The right to terminate does not affect any other legal remedies available to the Dacke Industri Group.

Raising Concerns We encourage the reporting of any suspected violations of this Code or applicable law. Concerns may be raised confidentially and, where permitted by applicable law, anonymously through our established reporting channels. All reports will be handled with discretion and investigated appropriately. No individual who raises a concern in good faith will be subject to retaliation, whether by the Dacke Industri Group or by any business partner acting on our behalf. You must ensure that your own workers are aware of the availability of these reporting channels and must not take any action to discourage or prevent reporting.

In short – what this means for you:

- Regularly assess risks related to legal compliance, human rights, and business ethics within your own operations and supply chain, and take timely action to address issues identified.
- Cooperate fully with any compliance verification activities conducted by or on behalf of the Dacke Industri Group, including audits and site visits.
- If a compliance issue is identified, engage constructively and promptly.
- Understand that serious or persistent breaches of this Code — particularly those involving criminal conduct, forced or child labour, or an unwillingness to remediate — may result in the immediate termination of our relationship.
- Ensure that your workers are aware of and able to access the Dacke Industri Group's reporting channels, and never discourage or penalise anyone for raising a concern in good faith.