

# Code of Conduct – Dancop Group

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## 1. Statement of Policy

It is Dancop Group's policy to maintain the highest ethical standards and comply with all applicable laws, rules, regulations and local customary practices. Adherence to this policy will ensure our continued success and maintain the confidence of our customers and the communities in which we live. To ensure compliance with this policy, we have established this code of conduct where the following general rules apply.

The Dancop Group commits itself to internationally recognized standards of responsible business conduct.

Our Code of Conduct is aligned with:

- **the International Labour Organization (ILO) Core Labour Standards,**
- **the Universal Declaration of Human Rights of the United Nations, and**
- **the OECD Guidelines for Multinational Enterprises.**

These principles form the foundation of our policies on human rights, labor practices, environmental responsibility and ethical business conduct.

## 2. Introduction

What is a Code of Conduct?

A Code of Conduct is a set of principles for desired ethical behavior. It sets the standards in various areas that all Dancop Group Employees and board members must adhere to in order to protect Dancop Group against financial losses and uphold Dancop Group's reputation as a company with a high level of integrity and trustworthiness.

To whom does the Code of Conduct apply?

All Dancop Group Employees, including board members, must adhere to the principles and requirements in this Code of Conduct.

Why does Dancop Group need a Code of Conduct?

As a global company, Dancop Group has Employees of many different nationalities, cultures, religious beliefs, and political views. This calls for commonly agreed ethical practices and standards.

The Code of Conduct provides guidance on how you should behave in uncomfortable situations and moral dilemmas, which call for support and clarification. It also sets out the framework for discretionary decisions.

The Code of Conduct does not replace personal responsibility or common sense. It sets standards and serves as a tool to help you understand Dancop Group's policies. However, situations, which are not covered by this Code of Conduct, do not exempt you from responsibility for your behavior.

## General compliance

Although the Code of Conduct is applicable and enforceable in any country where Dancop Group performs its activities, you are also subject to the national laws and regulations in your country, and to any laws that may apply specifically to your nationality. Where a local law sets higher standards than those set out in this Code of Conduct, the local law takes precedence.

This Code of Conduct proposes a set of minimum standards. Dancop Group business units may set stricter standards, as long as these do not conflict with the Code of Conduct.

If in doubt, you should consult your local management and/or Dancop Group's legal advisors, about the conduct to adopt.

### 3. Basic Employee Rights

#### Ethics

Dancop Group's continued success is dependent on employing the most qualified people. In order to do that, Dancop Group will ensure that it:

- Prohibits the use of compulsory or forced labor in any of its operations
- Prohibits the use of child labor in any of its operations as defined by the UK Modern Slavery Act
- Works for a safe and healthy work environment and maintains a framework of fair and just remuneration, fair working hours and leave, according to the laws or practices of the countries in which it operates. Dancop ensures appropriate and fair remuneration, at least in accordance with statutory minimum wage provisions. The remuneration structure is based on job responsibilities, level of responsibility, qualifications, and market benchmarks. Equal treatment and non-discrimination are guaranteed.
- Respects freedom of association and the right to collective bargaining for Dancop Group's Employees, according to the laws or practices of the countries in which it operates
- Seeks to support a culture of inclusion and mutual trust, dignity, and respect regardless of race, age, religion, political conviction, color, gender, national origin, sexual orientation, marital status, or disability.
- Insists on maintaining an environment without any discriminatory treatment of any kind in all phases of employment, including hiring, placement, promotion, transfer, compensation, benefits, and training
- Uses merit as the sole basis for decisions about all aspects of employment, including recruitment, development, and promotion
- Does not tolerate sexual harassment or any kind of abuse or harassment whether direct or indirect, physical, or psychological, verbal, or non-verbal.
- Ensures that every Dancop Group workplace is characterized by mutual trust and respect.

### 4. Social Policy

#### Diversity and Parity

We think that people of all gender should have equal access to job, education, and personal growth opportunities. We oppose all forms of discrimination against anyone based on their gender expression, race, religion or philosophical beliefs, handicap, sexual orientation, or age, and we want every employee to have access to a workplace that is free from harassment.

Any decisions about recruiting, selection, education, promotion, and career development are made based on professional, objective facts that are related to the demonstrated performance, the job at

hand, and prospective assessment.

### Parental Support

When hiring and during employment, we support all genders in their needs to balance parenthood and work by aiming for a gender-equal distribution in the workplace and flexible working hour-models that allow to take care of both responsibility areas.

All our office workstations are based on mobile devices that allow instant change of workplace from office to home if e.g. child care closes temporarily or children need to be taken care of for other reasons.

### Educational affairs

The Dancop group actively supports and encourages employee's desires and needs of professional development by enabling working hour models that allow the employees to follow their trainings and supporting educational trainings financially if the training enables a professional progress in the career of the employee.

### Retirement Provision

We as company acknowledge our responsibility in the context of the risk of poverty in retirement in the face of a growingly aging population. Not only do we provide financial possibilities to put savings aside into attractive pension systems, but we also pay into them from employer's side if wanted by the employee – surpassing hereby the national standard.

## 5. Respect for privacy

Dancop Group is committed to respecting the individuality of its Employees, including their privacy.

Dancop Group will therefore:

- Acquire or retain your personal data only to the extent that it is necessary for the administration of your employment with Dancop Group, or that it is required by any regulations or law in the country in question
- Make sure that access to personal data is limited to Employees who have appropriate authorization and a clear business need for that information
- The data will be deleted/purged when the processing is no longer required

You should keep in mind that Dancop Group owns all the email on its own mail server. Dancop Group is entitled to log your use of the mail system or other electronic footprints in order to ensure proper operation of our systems, check Employees' compliance with Dancop Group's IT security rules, or prevent or detect crimes.

Dancop Group also expects you to comply with the legislation regarding protection of personal data for our customers, patients, business partners, in addition to following Dancop Group's policies on personal data processing.

## 6. Documentation and reporting

Any business decision regarding Dancop Group's future is based on data, documentation, and reports. It is therefore crucial that the reporting and documentation is honest, accurate and complete. Besides being a legal requirement, adequate and trustful reporting is also of crucial importance for Dancop Group's stakeholders in general.

Dancop Group works hard to be a trustworthy company, so all company data must accurately reflect real transactions and events. This applies to all Dancop Group's data, not just financial matters.

Therefore Dancop Group will:

- Ensure that every transaction is properly authorized and recorded truthfully and accurately
- Ensure that all accounting follows Dancop Group's financial guidelines unless local laws prohibit this
- Demonstrate financial integrity in submitting or approving expense claims. Items to be charged to expenses are to be paid for by the highest-ranking Employee present
- Ensure that all documents are safely retained in such a way as to satisfy both internal and legal requirements

All transactions made by Dancop Group should be carried out in the best interests of the company and in such a way that nobody can doubt that Dancop Group is a responsible and sound company.

You must ensure that you enter transactions only in accordance with Dancop Group's rules on delegated authority.

Any Employee, who knowingly makes a false or misleading communication, correspondence or record will be subject to discipline, including possible termination.

## 7. Conflict of interest

A conflict of interest occurs when an individual's obligations and interests as a trusted Employee conflict with his or her private interests. Even the mere appearance of conflict of interest can seriously damage a company's reputation and ultimately its business. It is crucial for Dancop Group to conduct business activities in the best interests of the company.

Dancop Group's business partners need to know that your conduct is oriented toward the company's interests and not your own private interests. Whenever you face a potential conflict of interest, you should always discuss it with your manager before taking any further action.

A conflict of interest can take many forms, so it is your responsibility to exercise sound judgment over situations in which conflicts of interest could arise. The sections below set out some common cases, but they do not cover everything.

## 8. Investments and Personal Financial Interests

Employees must avoid personal financial interests that might conflict with the interests of Dancop Group. Such interest may also include obtaining a financial or other beneficial interest in a supplier, customer, or competitor of Dancop Group. This rule also applies to an employee's spouse and children.

## 9. Close relatives and close friends

Recommending a future Employee, for instance by passing on a CV, is encouraged at Dancop Group. However, you should never try to influence the process further than this.

If you have close relatives or close friends working for a business partner or competitor, this could cause a conflict of interest, because your personal relationship could affect the professional relationship between Dancop Group and the other company. If you think such a conflict of interest has arisen, or is about to arise, you should discuss the matter with your manager promptly.

## 10. Outside employment

Employees may pursue outside employment opportunities. However, any outside employment that interferes with the Employees job responsibilities or a conscientious performance of his/her duties is deemed a conflict of interest and is not permitted. Before taking any outside employment (e.g. as board member or consultancy) with companies in the same line of business as Dancop Group, you should discuss it with your manager to make sure that no conflict of interest will arise.

## 11. Health and safety

Dancop Group considers Employee safety and health as one of the highest priorities. Certain job activities, products or materials handled by our Employees require strict adherence to safety procedures, rules and regulations. Managers and Supervisors are responsible for ensuring all reasonable safeguards and precautions are taken in the workplace, including ensuring compliance with Dancop Group's procedures and guidelines, promoting safe work practices and the use of personal protective equipment. If any Employee has any safety related concerns those concerns should be reported to the local site manager.

Dancop Group also expects all its Employees to be able to perform their duties productively and safely and without the influence of alcohol or other substances. If you as a manager due to extraordinary circumstances find it appropriate to use alcohol at Dancop Group premises, this should be approved by HR in your geographical location. Even when approval has been obtained, the Employees are always obliged to consume alcohol responsibly and after work has ended.

Alcohol abuse or abuse of other substances at the premises of Dancop Group will not be tolerated, and Dancop Group will take appropriate action to ensure compliance with this policy. Anyone using alcohol or

other substances in the workplace without in advance having received approval to do so, will be subject to discipline, including termination.

## 12. Guideline and Process “Stop-Work-Authority”

What Does Stop Work Authority (SWA) mean?

Stop work authority (SWA) is an Occupational Safety and Health Administration (OSHA) program that gives workers and contractors the authority and responsibility to stop work if they observe unsafe conditions or behaviors on the jobsite.

Every Employee of the Dancop Group is given actively the SWA and according rights and protection against retaliation to ensure a maximum of Occupational Safety.

The SWA Process

The SWA process has several steps:

1. **Stop** working immediately when perceiving a dangerous situation
2. **Notify** coworkers, supervisors, and any other relevant individuals of the stop-work action
3. **Investigate** the situation and come to an agreement on whether work should resume or be suspended until the risk is mitigated
4. **Necessary corrections** shall be made and inspected by qualified experts to verify that the issue has been resolved and that work can proceed safely
5. **Resume work** once the relevant authority has approved of the situation and issued a notice that corrective actions have been implemented
6. **Follow up** from the safety responsible in the form of investigations, improvements, or relevant reports

## 13. Bribery

Bribery is offering, providing, or receiving something of value as an inducement or reward for something improper. We expect our Employees to:

- avoid participation in or benefit from any kind of corruption or bribery
- never offer, promise, authorize or give anything of value to any public official in any country or a business partner in order to obtain or retain an improper business advantage, including but not limited to facilitation payments

- abstain from solicit or accept any form of bribe from any person
- Dancop Group will always record accurately and completely the true nature of its activities with Dancop Group's books and records

Gifts, entertainment and hospitality are tokens of gratitude in business and private relations. The culture of gifts differs from country to country, and in some areas to reject a gift may give offence. However, excessive gifts, entertainment and hospitality may be used to seek undue business advantage.

Dancop Group is aware that in building long-term business relationships, gifts, entertainment and hospitality can play a part, whether it is about giving or receiving. However, these must always stay within reasonable limits. This is to ensure that Dancop Group retains its reputation as being fully independent of its business partners and can base its decisions on sound and objective arguments. Not only the value, but also the character of the gift, entertainment, or hospitality can compromise Dancop Group's reputation.

Gifts, entertainment and hospitality should always:

- Be legal
- Comply with any rules that apply to the third party
- Be intended only to build relationship or offer normal courtesy
- Be in a related reasonable amount

Hospitality in the form of travel, meals, sightseeing or other expenses may be offered to persons with a professional interest in the relationship only, but not to relatives etc. If hospitality is offered in relation to a congress or other relevant event, the hospitality can never last for a longer period than the duration of the event to which it relates.

Gifts, entertainment and hospitality that are always unacceptable are:

- Any gift of cash or a cash equivalent
- Any gift or entertainment that is offered for something in return
- Any entertainment that is potentially offensive, sexually oriented, discriminatory or otherwise conflicts with Dancop Group's values and which might harm Dancop Group's reputation
- Gifts or entertainment involving parties engaged in a tender or competitive bidding process

## 14. Competition incl. Market division, Price-fixing and Bid-rigging

Dancop Group is fully committed to compliance with the competition laws, which are designed to promote free and open competition in the marketplace. All Employees must ensure compliance with the Dancop Group Competition Guidelines, and competition legislation in their geography.

Market division or allocation schemes are illegal agreements in which competitors allocate specific customers, products or territories among themselves. Price-fixing is an agreement among competitors to

raise, fix or otherwise manage the price at which their products are sold. It is not necessarily limited to the competitors agreeing to charge the same price. Bid-rigging occurs when competitors effectively raise prices where purchases acquire goods by soliciting competing bids. Essentially agreeing in advance who will submit the winning bid on a contract.

Any Employee who violates competition laws will be terminated. In addition, any Employee, who knows or reasonably should know that competition violation has been or will be committed and fails to report it to the Compliance Officer will be subject to discipline, including termination.

## 15. Intellectual property and business secrets of others

Company and business secrets of Dancop Group and its contractual business partners must be treated confidential and must not be disclosed to unauthorized persons. Be aware that this obligation continues after employment. In case confidential information must be disclosed due to a decision of a competent court or administrative authority, Dancop Group's legal advisors must assist in determining what disclosure is required.

## 16. Money laundering and terrorist financing activities

Money laundering is the process by which individuals or entities conceal illicit funds or make them look legitimate. Money laundering is a serious crime and is regulated by international conventions and national criminal codes. National and international authorities now routinely monitor monetary transactions including bank transfers and currency exchanges.

Dancop Group will not condone, facilitate or support money laundering. You should look out for irregularities in the way payments are made and be cautious when working with business partners who appear to lack integrity. It is expected of Dancop Group, that all Employees report suspicious or unusual activity in accordance with the Policy on Anti-money laundering and terrorist financing.

## 17. Environmental Policy

Dancop Group is committed to full compliance with all environmental laws, standards, and guidelines in the jurisdictions where it operates. Any person who has reason to believe that Dancop Group may be violating any such laws, standards or guidelines shall report immediately to Dancop Group's Compliance officer.

We highly respect the global need for sustainable living, working and consumption. Our current approach consists of creating awareness and monitoring our current situational emissions and constant improvement through implementation of Carbon Footprint Calculations, researching sustainable sourcing possibilities and products. We aim to reduce all emissions to the minimum possible and optimize sustainability in all areas.

### The way is the goal.

We are actively transitioning our processes and working environment to reduce emissions and source sustainable solutions in various areas like sustainable energy sourcing, climate-neutral transportation, up-



to-date heating and building insulation to reduce energy consumption or reducing paper and printing consumption to a minimum.

We oblige ourselves to closely watch the developments in the electric and hybrid car industry considering the sustainability and environmental aspects of the entire product lifecycle from the raw material sourcing until the recycling of the cars at its end of life. Our goal is to switch the entire car fleet to hybrid, electric or hydrogen cars once the infrastructure and the sustainability of the product-lifecycle have reached a sustainable and responsible level on a global scale.

### Waste Management and Recycling

We separate all waste according to the local regulation. Our production monitors strictly the scrap rates and follows high recycling levels of as much material as possible. Excessive Cardboard material will be shredded and reused as packaging material. Wrapping foils are used as few as possible, handed over separately to the waste management companies and recycled according to the current state-of-the-art-possibilities.

### Water consumption

Our water consumption rate is reduced to the minimum possible. We do not use water in our production processes and have no chemicals or liquids that are directed into any water cycle. All water taps are equipped with water-saving faucet attachments.

### Awareness and training

We strive to make sure that all employees have the best possible awareness about sustainable processes and behave according to the state-of-the-art possibilities through yearly educational trainings.

## 18. Quality Policy

The main service our company provides for the society is safety. It is provided to our customers through our services and product solutions. We consider safety a precondition for every action we take. A high level of safety can only be achieved through a consistent high quality level within our services and products.

To embrace and create internal and external awareness of the importance of quality and safety, we have incorporated both values in the core Values of our company and aim to live by them day by day.

We set high value on the quality throughout our entire supply chain. This begins with a thorough inspection and selection of potential suppliers, a strict Supplier Code of Conduct, a thorough product onboarding process and extensive quality controls of the regular warehouse deliveries.

In the selection of potential carriers, different aspects of the quality of the carrier are considered. These are price-value-ratio, climate-neutrality-options, compliance with regular employment standards, training of the employees and service of the delivery to the customer.

Within our own production, a separate quality department and quality manager ensure the high standards and expectations regarding our own products are met. Frequent quality inspections and process audits,



together with frequently monitored quality-related key performance indicators make sure our products comply with our customers expectations in all terms and times.

## 19. Responsibilities and Sanctions

As an Dancop Group manager you must act as a role model for Employees by adhering to the principles set out in this Code of Conduct. You have a duty to inform, encourage and monitor the people who report to you in relation to the Code of Conduct. You must support Employees who raise questions or concerns in the conduct of their professional activities.

All Employees have a duty to report all violations and/or suspected violations of the Code of Conduct or other potentially unethical behavior by anyone employed by or working in the name of Dancop Group including customers, distributors, suppliers, subcontractors etc. to the Compliance officer, and there will be no retaliation for making any such reports. It is also possible to make use of the [Whistleblower Hotline](#) for anonymous reporting.

Employees must report violations or suspected violations without regard to the identity or position of the suspected offender. Reports will be kept strictly confidential.

All Employees must fully co-operate in any investigation of a suspected violation of this Code of Conduct and fully co-operate with any request made by the Compliance officer.

Any Employee found to have violated this Code of Conduct or engaged in other unlawful or unethical behavior will be disciplined, including demotion or dismissal. Any Employee who fails to report known or suspected violations of this Code of Conduct or other unlawful or unethical behavior will also be subject to appropriate disciplinary action.

The safety of Employees is a non-negotiable issue for Dancop Group. Since no Dancop Group Employee should endanger himself or herself under any circumstances, violations of the Code of Conduct are acceptable in cases of emergency, when security is at risk.

This document was last updated in April 2026.