

Code of Conduct

VINK PLAST



Vink Plast's Code of Conduct describes our requirements and expectations for compliance with social and environmental responsibility in our value chain.

This code of conduct also applies to Duka Ventilation's subcontractors.

Vink Plast's policy is to conduct business in accordance with legislation and generally accepted standards of justice and human decency. As a condition of trading with Vink Plast, we expect our suppliers to comply with these requirements, and expect their subcontractors to do the same.

At Vink Plast, we work systematically with improvements to our environment. We do this, among other things, through the purchase of materials that have the lowest possible impact on the environment and by focusing on recycling waste and residual materials in circular loops.

We work towards targeting specific goals for reducing our products' CO₂ emissions throughout their life cycle. We focus on innovative development in cooperation with our suppliers, and we work according to the principles of the circular economy and selected Sustainable Development Goals. (SDG's)

We will encourage and influence our entire value chain to promote positive environmental and social impacts and to reduce the negative ones.

In cases where we believe that a supplier is not complying with our Code of Conduct, we will initiate a dialogue to clarify the circumstances. We will strive to agree on a corrective action plan with a reasonable timeline that allows the supplier to be in full compliance with this Code of Conduct.

The purpose of this Code of Conduct is:

- To ensure our supplier's compliance with Vink Plast's environmental and ethical principles and guidelines, described in this Code of Conduct.
- To prepare our suppliers for the development of our mind set towards value chain cooperation, in order to retain existing suppliers in a mutual innovative development.

Vink Plast's suppliers are responsible for ensuring that the subcontractors in their own value chain comply with all sections in this Code of Conduct.

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1. Decent working conditions and ethical behavior

Suppliers to Vink Plast must ensure their own working conditions, which promote decent work for all women and men, including young people and people with disabilities, equal pay for work of equal value, and as a minimum payment of living wage in developing countries. They must maintain employees' human rights and treat them with respect and dignity as understood by the international community.

a. Forced labor

Suppliers to Vink Plast must implement effective measures to eradicate forced labor, modern slavery and human trafficking. This includes work on a forced contract, slavery and other forms of work performed against the will or choice of a worker, as well as work performed without appropriate payment.

b. Child labor

Suppliers to Vink Plast must take effective measures to eradicate all forms of child labor - such as work that harms children's physical or mental health or prevents them from going to school. When hiring young workers, suppliers must act in accordance with International Labor Organization (ILO) standards to ensure a ban and elimination of the worst forms of child labor.

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312327:NO

c. Anti-discrimination

Suppliers to Vink Plast must discourage all forms of discrimination in connection with employment (including employment, salary, benefits, promotion, discipline, termination or retirement) on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political beliefs, or social or ethnic origin.

d. Harassment and abuse

Suppliers to Vink Plast must treat every employee with respect and dignity and not allow any employee to be subjected to physical, sexual, mental or verbal harassment or abuse.

e. Working hours, wages and benefits

Suppliers to Vink Plast must ensure that working conditions, hours, breaks, leave and wages are in accordance with local rules and industry practice and are at a level that enables a fair standard of living according to local conditions, and that wages are not withheld as a disciplinary sanction.

f. Freedom of association and collective bargaining

Suppliers to Vink Plast must respect the employees' right to organize and negotiate collective wage agreements. If independent unions are either discouraged or restricted, the supplier should allow workers to gather independently to discuss work-related issues.

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g. Privacy

Suppliers to Vink Plast must respect their employees' right to privacy, when collecting or storing personal information and act in accordance with the EU Directive on General Data Protection Regulation (GDPR).

2. Healthy and safe working conditions

Suppliers to Vink Plast must comply with applicable working environment laws and regulations and provide a safe and healthy working environment to prevent accidents and injuries that occur within or as a result of the work or as a result of operation, disposition and management of the workplace. Including stress-related nuisances and diseases.

3. Environment

Environmental vision for Vink Plast:

“Vink Plast will focus on circular economy in the overall value chain. We want to create value for our stakeholders by distributing semi-finished plastic products and producing sustainable plastic solutions.”

Environmental vision for Duka Ventilation:

We want to be a leader in innovative ventilation solutions in a way that creates sustainable value for our stakeholders. We will focus on circular economy and selected SDG's.

Suppliers to Vink Plast must contribute to Vinks and Dukas Environmental vision, respectively, and add value to our joint customers by delivering optimal plastic solutions and by choosing plastic solutions with the least possible environmental impact.

Including:

- Minimization and sorting of all types of plastic waste.
- Reuse / recycling of production waste.
- Ensure that raw materials used in semi-finished products comply with the standards of the European RoHS and REACH regulations as well as the recommendations and regulations of the European Chemicals Agency (ECHA).
- If changes are made to basic materials on products that lead to changes in technical data, certifications or approvals, the supplier is obliged to provide this information to Vink Plast at least one month before the change.

We encourage our suppliers to create products that are energy efficient, recyclable and eco-labeled and to deliver them in recyclable, eco-labeled or FSC-certified packaging.

In order for Vink to evaluate supplier components and products according to the environment, suppliers must provide material information and relevant data sheets. We encourage our suppliers to calculate and pass on CO2 emission data and LCA's on all products.

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Environmental legislation

Suppliers must comply with applicable national and relevant international laws - including, but not limited to REACH, RoHS, working environment and possibly food contact at all times. Vink's suppliers are responsible for ensuring that subcontractors in the value chain also comply with applicable national and relevant international legislation.

Suppliers and subcontractors must, at all times, be aware of changes to legislation, so that implementation and possibly Declarations of Compliance are updated with changes before they take effect.

Aquatic environment management

Wastewater is handled responsibly in relation to reducing pollution of surface water, streams and the sea. Other spills - including chemical spills - are prevented through regular maintenance of machines and proper storage with collection vessels with a minimum collection capacity of 100%.

Waste to nature

Plastic-producing and processing companies must implement measures to prevent the spillage of granules into nature in accordance with the guidelines in Operation Clean Sweep. Find more information here:

<https://www.opcleansweep.org/>

Vink Plast will eventually phase out products that contain the following substances:

Materials containing more than 0.1% of substances on the EU Candidate List, including leaded PVC.

<http://echa.europa.eu/sv/candidate-list-table>

In cases where the limit value of 0.1% content of substances on the EU candidate list is exceeded, the supplier is obliged to register the product in the SCIP database: <https://echa.europa.eu/da/scip>

4. Ethics

a. Anti-corruption

Suppliers to Vink Plast must conduct their business without engaging in corrupt practices, including public or private bribery. Suppliers must maintain integrity, transparency and accuracy in corporate record keeping.

Suppliers must also work actively to reduce corruption and bribery - also in the value chain.

b. No unfair business practices

Vink Plast suppliers must act legally and with integrity in the handling of competing data, proprietary information and other intellectual property rights and must comply with legal requirements regarding fair competition, antitrust and accurate and truthful marketing.

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c Whistle Blower

If you, as a supplier, become aware of illegal and unethical behavior in Vink Plast, we encourage you to report your knowledge to the immediate contact, manager or alternatively the top management. Your report will, as far as possible, be treated confidentially, taking into account further scrutiny and investigation of referred issues.

Matters that should be reported include, for example, suspicion of corruption, bribery, fraud, forgery, serious environmental pollution, serious breaches of environmental safety and serious matters aimed at an employee, e.g. violence and sexual abuse.

5. Management systems

Vink Plast suppliers must introduce or work according to a management system designed to ensure:

- a) Compliance with applicable laws, regulations and customer requirements in connection with the supplier's products and operations.
- b) Compliance with this Code of Conduct; and
- c) Identification and mitigation of operational risks related to the areas covered by this Code of Conduct.

The management system must also drive continuous improvement.

6. Compliance

We reserve the right to check information provided by suppliers, as well as the supplier's compliance with Vink Plast's Code of Conduct. If the supplier violates the Code of Conduct, we will initiate a dialogue and request an implementation plan for improvements that brings the supplier back in full compliance with the Code of Conduct. If a supplier refuses or is unable to rectify the deficiency to our satisfaction, we will terminate the relationship as a last resort.

7. As a long term objective, Vink Plast will promote cooperation with suppliers who:

- Works according to certified management systems in the areas: quality, environment and working environment.
- Phases out fossil fuels and energy in favor of renewable energy, such as electricity from wind turbines, solar panels or heat recovery from soil or water in combination with electricity from renewable energy sources.
- Lead all wastewater to own or external mechanical and chemical treatment plant before discharge to surface water, stream or sea.
- Who, also when investing in new equipment, prioritizes the use of environmentally friendly technologies and industrial processes that provide savings on water, energy and reduction of CO₂-emissions. Including, for example, recycling of process water, recovery of cooling water, replacement of bulbs and fluorescent tubes with LEDs, transition to renewable energy, and other BAT measures. (BEST AVAILABLE TECHNIQUE).
- Sort production waste into clean fractions for recycling and avoids waste to landfill.
- Practice a sustainable procurement practice, reflected in a significant selection of sustainable materials and products, e.g. recycled, bio-based, renewable * and eco-labeled materials.

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- Promote sustainable management of all types of forests, through the use of FSC-, PEFC-certified or Nordic Ecolabelled cardboard boxes. Wood and wood-based products should in the long run be traceability certified according to FSC / PEFC's schemes or be made from recycled material.
- Participate in partnerships for the exchange of experience and knowledge for innovation and sustainable development.
- Can supply Vink Plast with LCA - including CO2 calculations - on products and transport.
- Practice openness in terms of sustainable development e.g. In the form of green reporting.
- Promote effective public and private partnerships. Strengthen sustainable development, complemented by partnerships with many different stakeholders that mobilize and share knowledge, expertise and technology.
- Measure progress towards sustainable development and environmentally friendly technologies.
- Use of transportation and own cars that live up to EU standard 6.

** Renewable raw materials are here defined as biological material that is reproduced by nature within a foreseeable amount of time.*

Date:

Company:

Name and position:

Signature/stamp:

To be returned signed to: cac@vink.dk

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