

CODE OF CONDUCT

PANZERGLASS A/S

10 PRINCIPLES OF THE UN GLOBAL COMPACT

Code of Conduct

PanzerGlass A/S ("PanzerGlass", the "Company" or "we") strive to operate our business responsibly in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption, and we encourage and our suppliers to do the same.

The purpose of this Code of Conduct ("CoC") is to ensure ethical and fair business practices of all stakeholders in the Company. We are convinced that a strong focus on how to conduct responsible business will ultimately benefit all parties and countries economically and socially.

This CoC applies to PanzerGlass, all the entities that we own or hold an ownership interest in, and the facilities that we manage. We also expect our suppliers and their sub-suppliers to uphold these principles and expects them to adopt similar policies within their own businesses and implement appropriate management systems to ensure compliance with our CoC.

In general, we encourage our suppliers to follow the ten principles of the UN Global Compact to operate their facilities and companies responsibly and to produce their products sustainably and ethically. Moreover, our suppliers must ensure that all employees involved in the production of our products are appropriately treated with respect.

It is our suppliers' responsibility that the content of this CoC is communicated actively to the employees and that the content is understood. The Company will periodically carry out audits of its suppliers to ensure compliance with this CoC.

The Ten Principles of the UN Global Compact

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

The labor force is the foundation of any business. PanzerGlass and our suppliers must respect international human and labor rights and strive to live up to the standards as expressed in the International Bill of Human Rights. Moreover, we expect that all suppliers take the necessary steps to avoid human rights violations in their countries of operation.

A Safe and Healthy Work Environment

- PanzerGlass and our suppliers shall take measures to ensure safe and healthy work conditions for all employees.
- PanzerGlass and our suppliers shall take measures to prevent work-related illness, accidents and injuries.
- PanzerGlass and our suppliers shall actively secure that all employees have favorable working conditions no matter where they are employed in the world.
- PanzerGlass and our suppliers should have standards for their own work environment, and we expect all employees to actively take part in this. We also expect the same for our business partners.
- Employees must not be subjected to physical punishment, threats of violence, or any other forms of physical or psychological abuse.
- Employees should have the freedom of speech and the opportunity to express their dissatisfaction with their working conditions in an open and honest manner. Whistle-blowers must be protected.

Food, water, toilet/bath and housing facilities

- Employees must have easy access to food, sanitary food storage, and fresh, clean, drinking water.
- Employees should have toilet and bath facilities; preferably separated by gender.
- If the labor force is living/sleeping at the production facility or in the vicinity of the facility, any housing facilities must live up to the national standard of living.

Salary, remuneration and leave

- Employees should be offered fair and competitive compensation. Wages must, as a minimum, satisfy the basic needs of the employees and their families in all countries and live up to the minimum requirements of national law and business standards (whichever is higher).
- All employees should, prior to their employment, receive written and easily understandable information about compensation conditions and paydays. This is often stated in the employment contract.

- Employees are entitled to sickness-leave and maternity-leave in accordance with local legislation and relevant policies.

Working hours

- Working hours for a normal working week may not exceed 48 hours, and with overtime included, may not exceed 60 hours. Overtime should be planned in a way that ensures safe and humane working conditions. Employees may work more than 60 hours per week if they freely wish to do so, and if local legislation permits it.
- Working days must always comply with local legislation, and employees are entitled to at least one day off a week.

Discrimination

- PanzerGlass and our suppliers are not allowed to discriminate against employees, customers or others in the supply chain on the basis of race, skin color, gender, language, religion, political or other beliefs, age, disability, nationality, social or ethnic background, financial circumstances, sexual orientation, origin or other status recognized by international law.

Privacy & IT Security

- PanzerGlass and our suppliers must respect the right to privacy of their employees and customers.
- For PanzerGlass employees, potential information security breaches should be reported to the GDPR Council immediately to ensure that prompt action can be taken.
- Suppliers have access to PanzerGlass' products and data throughout our collaboration process. We expect our suppliers and sub-suppliers to maintain an appropriate level of security in the prevention of unauthorized access. This is to prevent damage, misuse, distribution or removal of critical or valuable information in relation to our products and this applies to both external persons and individual supplier' employees. Stakeholders who identify any potential data leak or IT security issue should contact the following email address immediately: info@panzerglass.com

LABOUR STANDARDS

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor;

Principle 6: the elimination of discrimination in respect of employment and occupation.

Our people are our greatest asset, and they are the ones who make it possible for us to run our business. We strive to ensure the best possible labor standards and we set the bar high in terms of employment standards for our employees. We also expect our suppliers to treat their employees with respect and strive to live up to the statements.

Child Labor, Modern Slavery, Forced Labor and Freedom of Movement

- We do not use, nor do we accept, the use of child labor, directly or indirectly. If we determine that one of our suppliers or sub-suppliers uses child labor, we will end the cooperation immediately. In general, children should not work until they are above the compulsory school age. The minimum age for full-time employment is 15 years (or 14 years should local legislation permit it). Employees who are younger than 18 years old must not carry out hazardous work or work at night, regardless the number of hours they work. The minimum age for light work/after schoolwork (that does not interfere with a child's education) is 13 years of age (or 12 years should legal local legislation permit it).
- Regarding all types of work, the young age of an employee should be taken into consideration when planning and organizing work tasks, work hours and workloads.
- We do not use nor accept any kind of use of modern slavery and in case this is found we will end the cooperation with the supplier immediately.
- Forced or bonded labor – directly or indirectly – in any kind of work or service performed involuntarily under the threat of penalty. Employees must always have the right to freedom of movement during their employment.
- PanzerGlass and its suppliers must not withhold personal documents, work permits or salaries of their employees.

Freedom of association and right to collective bargaining

- PanzerGlass and our suppliers must acknowledge and uphold the freedom of association and the right to collective bargaining. In countries or situations where freedom of association and collective bargaining is restricted by local legislation, suppliers must recognize that employees can exercise their freedom of association and collective bargaining.

Diversity

- We strive to have a diverse workplace reflecting the society and the world we live in.
- We expect all employees to treat each other with mutual respect and openness.
- We do not accept any form of discrimination regarding race, skin color, religion, political, sexual orientation, gender, national origin or social rank or status.

Discrimination

- When recruiting people and during employment PanzerGlass and our suppliers must not discriminate based on; race, skin color, gender, language, religion, political or other beliefs, age, disability, nationality, social or ethnic background, financial circumstances, sexual orientation, origin or other status – either directly or indirectly.

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

At PanzerGlass we are in business to extend device life with top tier accessories to support a sustainable future. This is an ongoing commitment to protection, quality, and circularity.

Today the company has grown into a global business with presence on 5 continents. We believe that as our business grows, so does our responsibility to finding sustainable solutions for everything that we do. Looking at the lifecycle of our products, and constantly analyzing how to improve, we take a circular approach. Examples include increasing recycled content in our products, finding innovative ways to reduce packaging, and optimizing logistics routes to reduce cost and carbon emissions.

Suppliers Must Strive to:

- Report energy consumption and consider renewable energy solutions.
- Understand decarbonization pathways and formulate carbon reduction actions.
- Report waste and emissions to air, soil and water, and work to reduce waste and pollution throughout their operations.
- Ensure compliance with REACH and RoHS regulation.
- Report and handle chemicals in an environmentally responsible way.
- Handle, store and dispose hazardous waste in an environmentally responsible way.
- Strive to reuse and recycle water, materials and products.
- Strive to implement environmental friendly technologies.
- Report any potential data leak/IT security leak by contacting the following email address immediately: info@panzerglass.com

Conflict Minerals:

- PanzerGlass is dedicated to responsible sourcing. As such, our representatives must ensure that they do not engage in transactions involving raw materials such as tin, tantalum, tungsten, or gold, which may directly or indirectly fund armed conflicts or contribute to human rights abuses.
- Suppliers must comply with applicable laws and regulations on conflict minerals. If products manufactured and/or delivered by the suppliers contain any of the listed conflict minerals, PanzerGlass must be notified immediately without hesitation.

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

PanzerGlass and our suppliers must work actively to combat and prevent corruption, extortion, fraud, and bribery. In general, all illegal forms of corruption and fraud are strictly prohibited, and our suppliers must understand that such activities may result in immediate termination of the business relationship, communication to relevant authorities and organizations, as well as legal actions.

Anti-corruption

PanzerGlass is dedicated to preventing bribery and maintains a zero-tolerance policy towards fraud. The company is committed to halting any offering, promising, giving, accepting, or soliciting of an advantage as a bribe for illegal or unethical actions, or any general breach of trust.

- PanzerGlass and our suppliers may never offer or accept any form bribery or commit fraud.

- All employees are encouraged to inform management in case they are offered bribery in any form and it will be addressed by management. This includes any instance where there is, or is perceived to be, a personal benefit in addition to the benefit for the company.
- Bribes intended to induce or reward favorable buying decisions and governmental actions are unacceptable and prohibited.

Additionally, PanzerGlass commits to evaluating third-parties the company engages with (ie. suppliers, vendors, commission agents, brokers, sales representatives, distributors, contractors, customs brokers, consultants) to ensure compliance with anti-corruption and anti-bribery. This is done by:

- Evaluating third-party risk.
- Collecting publicly available data on third-party commitments and policies.
- 3rd party audits of main suppliers through SEDEX or BSCI.
- Review of official notice, fine or prosecution for any non-compliance with business ethics legislation, regulation, consent or permits (within the last three years) for main suppliers.

Whistleblower System

- The whistleblower system at PanzerGlass promotes ethical behavior in all business relationships. Our whistleblower system allows employees, supplier representatives and stakeholders not directly employed by PanzerGlass to report illegal or unethical practices and violations of this Code of Conduct, such as potential discrimination or bribery. For PanzerGlass employees, supplier representatives and stakeholders, unethical acts should be reported to the whistleblower portal.
- Concerns can be reported to the whistleblower portal on the PanzerGlass website, as well as on the intranet for company employees. This portal is third-party controlled and operated. All reports made in good faith and within scope will be investigated. PanzerGlass ensures anonymity and confidentiality to everyone involved in the investigation without fear of retaliation. Deliberate reporting of untrue allegations is not allowed.

Adopted on 1. February 2024



Jimmy Olsen, CEO
PanzerGlass A/S