Contour

Contour Design - Code of Conduct for Business Relationships

I. Introduction

CONTOUR DESIGN is committed to contribute to sustainable development. A basic part of this is to ensure responsible business conduct; internally and with business relationships, confer our overall Sustainability Policy.

We have no intention of inventing our own framework or standards when raising expectations to our business relationships but wish to rely on internationally agreed principles. We respect internationally agreed core principles for sustainability, confer II.1. below. In addition to complying with national laws, we expect our Business Relationships to implement the internationally agreed minimum standard for responsible business conduct.

With this CoC we wish to collaborate with our Business Relationships, hereunder suppliers and partners, towards proliferation of adequate due diligence for sustainable development.

II. Management expectations

CONTOUR DESIGN expects its Business Relationships to develop and implement a management system that is aligned with the internationally agreed minimum standard for responsible business conduct; i.e. the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD).

II.1. Scope

The required management system shall, at a minimum, cover the areas of potential impacts referenced by the UNGPs/OECD. These areas are similar to the areas covered by the UN Global Compact's ten principles – human rights (including labour rights), the environment, and anti-corruption. We undertake the following actions as defined by the UNGPs/OECD and expect the same from our Business Relationships:

II.2. Adopt a Policy Commitment

The Policy Commitment of our Business Relationships shall:

- be approved at the most senior level of the company;
- ii. be informed by experts on the UNGPs and OECD;
- iii. stipulate the company's expectations of employees and its business relationships;
- iv. be publicly available and communicated both internally and externally; and

Contour

v. be embedded in all other operational policies and procedures throughout the company.

II.3. Establish and Maintain a Due Diligence Process

Business Relationships are expected to:

- i. Conduct regular operational-level assessments of risks of actual and potential adverse impacts on the Scope (see above),
- ii. Act to prevent, mitigate or remediate the actual and potential adverse impacts identified,
- iii. Communicate findings, actions taken, and indicators to measure effectiveness of actions to relevant stakeholders, including, when requested, to CONTOUR DESIGN, and
- Require that their own Business Relationships meet the global minimum standard.

II.4. Provide for access to remedy

Where Business Relationships cause or contribute to actual adverse impacts in relation to the Scope, Business Relationships must provide access to remedy through legitimate processes (grievance mechanisms).

Where Business Relationships are *linked* to actual *severe* adverse impacts the Business Relationships shall use or build leverage to make the causing entity stop the impacts and prevent their re-occurrence.

III. Implementation

Under the UNGPs/OECD it is the responsibility of CONTOUR DESIGN to require from all its business relationships to also meet the minimum standard. Hence, this CoCBR applies to all first-tier Business Relationships of CONTOUR DESIGN. Part of their responsibility will be to require the same from their business relationships, confer II.3.iv. This will lead to scaling up of responsible business conduct globally.

This CoCBR forms the foundation for any collaboration between CONTOUR DESIGN and our Business Relationships. If a UNGPs/OECD management system is not in place at the time of signing, an implementation plan should be developed. CONTOUR DESIGN expects Business Relationships to be able to declare their stage of implementation at any time; the adoption of a policy, confer II.2., shall be in place no later than one year from signing, and the first operational impact assessments, confer II.3., shall be finalized no later than two years from signing.

Contour

Business Relationships shall maintain appropriate records to demonstrate compliance with the requirements of this CoCBR. Appropriate records include:

- Policy commitment(s), confer II.2. above;
- Documentation of due diligence processes, confer II.3.iii above;
- and documented grievance mechanisms; confer II.4. above

Business Relationships shall immediately inform CONTOUR DESIGN about severe adverse impacts identified and how the impacts are handled.

If Business Relationships neglect to notify CONTOUR DESIGN or if they demonstrate lack of willingness to meet the international minimum standard, CONTOUR DESIGN reserves the right to end the business relationship immediately.

Policy last updated September 28th 2022

Kenneth Nielsen, CEO