

## Contour Design – Code of Conduct for Employees

CONTOUR DESIGN has committed to sustainable development as expressed in our CONTOUR DESIGN Sustainability Policy Commitment. We all work hard to make a positive change for sustainable development. It is the right thing to do, and it improves the value of our business and that of our business relationships – both short- and long-term.

CONTOUR DESIGN expects our employees, management, and board members to assist us meeting our Commitment. This Code of Conduct for Employees (CoCE) informs you, as a valued team member, what the Commitment entails in practice. In addition to this CoCE, you are expected to read and follow our policies and procedures that cover your areas of responsibility.

CSR, ESG or Sustainability covers three elements: Social, Environmental and Economic Sustainability. The key elements are defined by the international community. These elements form the basis of our Commitment and this CoCE. We regularly assess our impacts against the key elements and require our business relationships to do the same.

### A. Overall Expectations

In all actions and activities, CONTOUR DESIGN expects you to:

1. Comply with the law.
2. Comply with this CoCE.
3. Raise questions if you are in doubt.
4. Listen, and not retaliate, if others raise concerns.
5. Make sure that business relationships become aware, that we expect them to act responsibly, see also the CONTOUR DESIGN Code of Conduct for Business Relationships.

### B. Social Sustainability

Treat others with dignity. Please keep in focus that we all appreciate forthcoming colleagues that assist in creating the best products and the best experience for our customers.

In relation to **social sustainability**, CONTOUR DESIGN expects you to:

1. Prevent and denounce discrimination on all discrimination grounds, such as gender, sexual orientation, 'race', colour, national origin, ethnicity, religion, language, disability, functional variations, health challenges, age, union- or

political affiliation or other status. This involves not to act upon prejudices that we may all be constrained by.

2. Avoid and denounce any form of degrading treatment, bullying, or harassment. CONTOUR DESIGN has zero-tolerance towards discrimination and harassment.
3. Attend to ensuring equal opportunities by promotion and equal pay for equal work.
4. Attend to safe and healthy working conditions and provide for ideas to further improve such conditions at work, including diligently reporting on near misses and contribute to further improvements of our products.
5. Appreciate and seek to accommodate differences in opinions and persuasion.
6. Seek to accommodate expecting persons or recent parenthood.
7. Assist training new employees, attend to your own professional development, and display fairness when you need to let a colleague go.
8. Appreciate the right to rest, leisure and paid holidays when planning your and your colleagues' activities.
9. Ensure that no employees are brought in a situation, where they experience that they are not free to leave employment with due notice.
10. Appreciate and acknowledge the work of others, colleagues or third parties, when you make use of such work in your deliveries
11. Share information of importance to your colleagues for solving their tasks and ask for the information you need to solve yours.
12. Respect and protect the privacy of others, including appropriate handling of personal data, see our Privacy Policy.
13. When limiting freedom of expression of others be precise and provide for reasoning. Please note that all communication to media on behalf of CONTOUR DESIGN shall be approved by our CEO or CMO.

## C. Environmental Sustainability

Care about our environment. In relation to **environmental sustainability**, CONTOUR DESIGN expects you to:

1. Continue developing ideas and innovations to improve the lifespan of our products, circular economy, reduction in use of raw material, reduction in use of packaging material, or the application of reusable materials.
2. Always consider alternatives with a view to reduce the Green House Gas emissions of actions or decisions. Our ability to save energy may directly impact the climate.
3. Constantly seek to improve our ability to reuse and reduce waste.

4. Seek to provide for a good example in relation to preventing or mitigating other impacts on the environment, e.g.,
  - a. handling and disposing of chemicals with utmost care for the environment
  - b. using environmentally friendly technologies, when possible.

## **D. Economic Sustainability**

Do not engage in activities that undermine **economic sustainability**. CONTOUR DESIGN expects you to:

1. Abstain from receiving or giving any bribery or facilitation payments to obtain advantages, also through intermediaries and by trading in influence. CONTOUR DESIGN has zero-tolerance towards corruption and bribery.
2. Abstain from receiving or giving gifts or entertainment of disproportionate sizes. Gifts or entertainment to or from the same recipient (physical and legal persons) should be avoided. Gifts should be kept below the income taxable amount in any country, and if not available the limit is 80 Euro. For entertainment a total value above 150 Euro or per occasion – per person, must be registered and approved by the CEO through the gift register.
3. Abstain from cronyism and nepotism.
4. Economic sustainability also requires that we constantly stay clear of allegations of extortion, fraud, embezzlement, anti-competitive behaviour, or tax avoidance.
5. Ask if you are in doubt, whether an action or decision contradicts these requirements.
6. Always say no, if you think that the decision, action, or omission would damage our reputation, if made public.
7. Always respect and follow the code of conduct and personal boundaries of any of our stakeholders or business partners if this is stricter and brought to your attention. Act in good faith.

## **E. Tell Us and Whistle-blower-mechanism**

1. Please speak up. We have an open-door culture, and we very much appreciate your input; not only when you experience adverse impacts, but when you have ideas for improving our performance in relation to social, environmental, and economic sustainability.
2. Please bring grievances to your immediate manager, and, if your grievance concerns your manager, to the level above your immediate manager.

3. You may raise concerns about, or ideas for improving our ability to prevent or mitigate, risks of adverse impacts on the key elements of sustainable development to our Head of Sustainability.
4. You submit similar information (confer 3) through our grievance mechanism.
5. If you suspect that an adverse impact also amounts to a violation of law, and/or you are uncomfortable to bring up the grievance directly with management, and/or will you prefer to submit the grievance anonymously, you may use our whistle-blower mechanism.
6. CONTOUR DESIGN assures you that grievances brought forward in good faith will not be met with any kind of reprisals.

Policy last updated September 28<sup>th</sup> 2022

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right. The signature is positioned above a horizontal dashed line.

Kenneth Nielsen, CEO