



# CODE OF CONDUCT

## NORDBAEK ApS

In NORDBAEK ApS we are dedicated to promoting Corporate Social Responsibility (CSR). We regard it as a necessary challenge both here in our company and in our work around the world. This Code of Conduct describes the ethics that NORDBAEK wishes to promote.

It is directed to our suppliers and their subcontractors, and it is a non-negotiable requirement from our side that our suppliers work actively with the issues of social compliance as lined out in this Code of Conduct.

We are aware that cultural differences and other factors may vary from country to country, but, in general, we will not compromise with our Code of Conduct. We may, however, be willing to negotiate a compromise on some points in specific situations, but always with the final goal of achieving the standards set out in the Code of Conduct.

NORDBAEK expects all its suppliers to respect the Code of Conduct and actively do their utmost to follow the standards. We believe in cooperation and we are willing to work with our suppliers to achieve workable solutions in each individual case where the supplier does not conform to the standards.

We are always trying to keep an open mind and we strive to preserve a good dialogue on all levels. It is very important that our suppliers also have an open mind, as we can improve social and environments issues, only if we cooperate towards the same goals.

This Code of Conduct contains the following paragraphs:  
General Principles  
Specific requirements

- A. Working environment and safety
- B. First aid
- C. Fire
- D. Chemicals
- E. Child labour
- F. Social responsibility

### General Principles

1. The supplier shall observe the legislation in force at the time in question. This includes an obligation to observe and comply with all EU product requirements at any given time.
2. Even though NORDBAEK acknowledges that legislation and cultural patterns vary across the world and that suppliers consequently operate under different circumstances, this Code of

Conduct sets out the basic requirements that any supplier must comply with in order to do business with NORDBAEK.

3. Suppliers who deliver and/or manufacture products for NORDBAEK's customers shall operate in compliance with the laws and regulations in force in their respective countries and in compliance with this Code of Conduct. In case the law in question is more comprehensive than this Code of Conduct, current law applies. In case this Code of Conduct is more comprehensive than the law in question, this Code of Conduct applies.
4. We take it for granted that our suppliers and their subcontractors treat people with respect and dignity.
5. We take it for granted that our suppliers and their subcontractors treat the environment with respect and consideration.
6. NORDBAEK will constantly implement and develop its follow-up system regarding evaluation and compliance with the Code of Conduct. The supplier will allow NORDBAEK, and/or anyone who represents NORDBAEK, free access at any time to their facilities and employees and to all the relevant data.
7. This Code of Conduct also forms the base upon which NORDBAEK will make a continuous evaluation of the suppliers compliance with NORDBAEKs requirements and expectations.

Should we find that a supplier does not comply with our Code of Conduct, and if no workable solution is found, and if corrective measures are not taken within an agreed time limit, we will immediately terminate the co-operation with the supplier and cancel our existing orders.

The supplier should ensure that the content of this Code of Conduct, at least in headlines, is communicated to the employees including posting a copy of the Code of Conduct in the local language and in a place accessible to the employees.

## Specific Requirements

NORDBAEK is working towards the content of SA8000 (Social Accountability) which is a certification working for decent work conditions for all people involved in developing and producing products. NORDBAEK aims to achieve that all suppliers follow the basic standards for SA8000.

Whenever any other certification is mentioned in connection with a product e.g. Fairtrade, Organic Exchange, GOTS, the supplier is expected to have knowledge of – or to seek information on – the requirements.

## Working Environment and Safety

1. The supplier shall ensure that indoor production and work areas have adequate air circulation. Indoor work areas should be fitted with windows. Fans, air-conditioning and/or radiators should be available depending on local conditions.
2. The employees should have reasonable and acceptable access to drinking water and toilet facilities. Sanitary conditions should be satisfactory and kept clean.
3. The supplier shall constantly increase safety in production by ensuring sufficient light in the areas used for – as an example – cutting, checking, pressing and finishing activities.
4. The machines used should be equipped with operational safety devices, to be inspected and maintained regularly.
5. The supplier shall ensure the health of the employees partly by complying with current law and partly by protecting the employees against the risks involved in performing their work. This applies to any work routine whether electrical, mechanical or administrative.
6. The supplier will provide safe working conditions for all employees and will not expose them to dangerous working practises.
7. The employees should be protected against noise, air pollution etc. by mandatory use of personal protective equipment (PPE) against damages to hearing, sight, respiratory passages

(inhalation) etc. In the relevant production units the employees should wear safety gloves, masks or whatever necessary for the safety.

8. This protective equipment should be made available to the employees by the supplier, free of charge.

9. The supplier is responsible for educating the workers about the reasons for using personal protective equipment and the consequences of not doing so, and to make sure that the equipment is used.

10. The supplier shall register the occurrence of accidents at work. These statistics are to be kept with the person responsible for production.

11. If dormitory facilities are provided, they should have sufficient sanitary conditions, windows and drinking water. They must be kept clean and safe and meet the basic needs of the personnel and the minimum legal requirements.

## First Aid

1. For medical purposes the supplier shall place at least one regularly updated and well- stocked first aid kit in each production unit.

2. The supplier shall select and train a number of employees to take on the responsibility to give first aid.

3. The supplier shall have procedures for the handling of serious accidents that require treatment outside the premises of the supplier.

### C: Fire

1. The supplier shall consider the safety of the employees by constantly making sure that passages, stairways and exits are unobstructed to facilitate any emergency evacuation. At no time should clothes, raw materials, mechanical parts or the like be placed in passages, stairways or near the exits.

2. The supplier shall – in a noticeable colour, for instance in yellow – clearly indicate where the escape routes are located.

3. The main exits must not be locked during working hours.

4. Fire alarms should be placed in each production unit and in the large offices along with fire extinguishers that are regularly checked and maintained.

5. The supplier shall select and train a number of employees to take on the responsibility to use fire extinguishers.

6. A fire drill is to be held at least once a year.

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### D: Chemicals

1. The supplier shall store dangerous and/or toxic substances safely in locations that are adequately ventilated and ensure that the handling of these materials is safe.

2. The supplier is responsible for educating the workers about consequences of working with dangerous and toxic substances, and to make sure special training is given to workers in direct contact with the substances.

3. Waste from use of dangerous and/or toxic substances should be treated in accordance with applicable law.

4. The supplier should be able to give an account of (a) storage of toxic substances (b) protective measures in connection with handling of toxic chemicals (c) procedures in case of accidents involving chemicals and finally (d) access to first aid and hospital treatment.

5. The supplier should be able to give an account of the chemical composition of the dyes used in production. Therefore, the supplier is expected to ask for a declaration of the content of the dyes from the supplier of dyes. Any specifications submitted by the supplier of dyes should be verified by an internationally recognized laboratory.

### E: Child labour

First of all NORDBAEK respects national law and culture, but below NORDBAEK has made some standards to follow in case national law does not cover this area.

NORDBAEK does not approve of child labour and we believe that loving care and access to education creates a better life for children. However, we understand that life conditions may vary and we are willing to support suppliers making an effort to help children. We accept no less than what the national law requires.

1. The supplier shall at any time be able to verify the age of an employee.
2. We define the word "child" as a person younger than 15 years of age, or as an exception - 14 years - if the national law sets this limit.
3. The supplier is not allowed to use employees at an age younger than this in production or anywhere else in the business.
4. In countries where the law permits apprenticeship programmes for children between 12 and 15 years of age, we will accept that children work a few hours per day. The total number of hours daily spent on school and light work should never exceed 7 hours.
5. The factory must be able to prove that this work is not interfering with the child's education. That the work is limited to a few hours per day, that the work is light and clearly aimed at training, and that the child is properly compensated. If NORDBAEK has any reason to doubt that these conditions are met, such apprenticeship programmes will not be accepted.

NORDBAEK require that the supplier makes sure that any workers under the age of 15 and up to the age of 18, have at least one free meal a day.

As we base our policy on child labour on the UN Convention on The Rights of the Child (article 32) we also recommend our suppliers to make sure, that employees in the age group 15-18 years are treated accordingly. Limits for working hours and overtime for this age group should be set with special consideration to the workers' low age.

If a child is found working under other circumstances than what is mentioned above, NORDBAEK will require that measurements be taken in the child's best interest. We will, in cooperation with the factory, seek to find a satisfactory solution, taking into consideration the child's age, family situation, education etc.

NORDBAEK will, in such a serious situation, not regard it as a solution to dismiss the child, or immediately stop the cooperation with the supplier. Any measures taken should always aim to improve, not worsen, each individual child's situation.

## Social responsibility

1. The supplier shall comply with current law concerning wages, compensation for overtime and payment procedures. The employees are entitled to at least a statutory living wage or the standard wage of the industry. If these rates differ, the employee is entitled to the highest rate.
2. Withholding wages must not be used as a disciplinary measure.
3. The employee must be able to explain the composition of his earnings to a third part. Therefore the employee should have a pay check containing all relevant information such as basic pay, overtime pay, deductions etc., all written in an understandable language.
4. Working hours should be in accordance with current law. This applies both to daily and weekly working hours. If no current law applies in the field, NORDBAEK stipulates the maximum working hours per week to be 48 hours.
5. Working hours must be organised in such a way that the employee can plan his own leisure time.
6. In each 7-day cycle the employee is entitled to at least one day off.
7. Whenever overtime work is a necessity, the supplier cannot demand a working week for each employee in excess of 60 hours.
8. The supplier shall not on a regular basis make use of overtime work.

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9. The employee is entitled to refuse overtime work without being exposed to threats or disciplinary measures or dismissal.
10. The supplier shall comply with the Universal Declaration of Human Rights art: 19 on freedom of opinion and expression.
11. The supplier shall accept the employee's freedom of association and the right to collective bargaining. Their doing so shall not result in any negative consequences to them.
12. If the right to freedom of association and collective bargaining is restricted by national law, the supplier must facilitate parallel means of independent and free association and bargaining for all such employees.
13. The supplier shall facilitate the communication between the workers and the management by advising the workers to appoint a contact person representing the workers.
14. NORDBAEK recommend suppliers with predominantly female workers to arrange day care for children below school age.
15. Under no circumstances do we accept that our supplier uses corporal punishment or other forms of mental or physical disciplinary actions, or engage in sexual harassment.
16. Employment with the supplier shall not be subject to discrimination regarding, race, colour, nationality, religion, gender, age, sexual orientation, cast or marital status. This includes discrimination when recruiting, when settling the compensation, in cases regarding access to training, promotion, termination or retirement; all of which shall be based only on the employees' ability to do their job.
17. The supplier must neither use illegal workers nor any kind of forced, bonded or prison labour.

Final comments:

In NORDBAEK Aps, respect, integrity and cooperation are our key words. We believe that a dedicated mutual effort between the supplier and NORDBAEK will help us achieve, maintain and build onto what we believe is our common goal: Social compliance according to this Code of Conduct. We are open to finding solutions and therefore a close supplier relation is always our aim.