

# ORFER GROUP'S CODE OF CONDUCT FOR SUPPLIERS

## 1. We are committed to drive sustainable development together with our suppliers

Orfer Group (hereinafter referred to as Orfer) provides its extensive clientele with sustainable secondary packaging and palletizing automation systems and responsibly produced steel structures. We work closely with our clients to ensure the longevity of their automation systems through comprehensive lifecycle services. Similarly, our steel structures are built to last. Our promise, "Driving sustainability in packaging and logistics," reflects our strong commitment to the future. We pledge to leverage our expertise and serve as a driving force for sustainable development.

Our responsible supplier network plays a crucial role as we build a sustainable future together.

With the purpose of ensuring a responsible conduct, Orfer's Supplier Code of Conduct summarises the requirements we have on our suppliers. Our overall goal is to encourage respect for Human & Labour Rights as well as Environmental protection and Business ethics with our external partners.<sup>i</sup>

Suppliers are expected to inform Orfer of any severe human rights violations, environmental or economic harm they may cause, contribute to, or be directly linked to.

### 1.1 Scope

- This Supplier Code of Conduct applies to all suppliers and intermediaries of both products and services to Orfer

### 1.2 Compliance with the law

- All Orfer's suppliers are expected to comply with applicable national laws.



Version	2.0
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Responsibility	CPO

## 2. Business ethics

All forms of corruption, bribery, money laundering and unlawful restrictive trade practices are strictly prohibited.

- The supplier shall establish and follow effective procedures to prevent corruption, bribery, money laundering and unlawful restrictive trade practices in all of their business activities.
- The Supplier shall not supply to Orfer any goods that have been sourced from parties that are subject to sanctions imposed by the United Nations, the European Union, the United States, or any other country with jurisdiction over the Supplier.

## 3. Environmental responsibility

The supplier shall assess significant environmental impact of operations, and establish and follow procedures that reflect their environmental responsibility.

- The supplier shall comply with national and international environmental legislation and regulations
- The supplier shall actively work to reduce emissions into the air, soil and waterways and make more efficient use of resources.
- Environmental aspects shall be taken into consideration throughout the production and distribution chain, from the production of raw materials to the sale of end-user products.

The Supplier shall secure that all chemicals are stored, handled, used, transported, labelled, and disposed of in a safe and responsible way. The Supplier shall ensure that employees handling chemicals have the right competence and, if needed, arrange training. The Supplier has site specific procedures and plans how to prevent and respond to all environmental emergency

situations (spills, leakages and releases/emissions and other risk) that have a potential to impact the environment. The Supplier shall have a procedure for appropriate disposal of waste in accordance with domestic or EU waste legislation. The supplier shall pay attention to preventing and minimising the waste and loss of raw materials according the EU waste management principles (reduce, reuse, recycle, energy recovery or disposal/landfill). The Supplier shall ensure that the employees handling waste maintain desired routines and have the right competence, and if necessary, arrange training.

## 4. Social responsibility<sup>iii</sup>

The supplier shall support and respect internationally declared human rights and treat its employees fairly, equally and with respect.

### 4.1 Health and safety management

- The Supplier is required to have an Occupational, Health and Safety (OHS) management system or otherwise fulfil at least the domestic and/or EU regulations and legislation regarding occupational health and safety. The Supplier shall secure that its employees have a safe working environment. The Supplier needs to have a documented process to manage work related illnesses.

Version	2.0
Date	1.4.2024
Responsibility	CPO

#### 4.2 Freedom of association<sup>iv</sup>

- The supplier shall respect its employees' right to form or join trade unions as well as the right to collective negotiations.

#### 4.3 Working hours<sup>v</sup>

- Working hours, breaks and vacations must comply with national legislation and agreements as well as international agreements.
- Working hours, excluding overtime, shall be identified by contract, and is expected not to exceed 48 hours per week. Overtime shall be voluntary, shall not be requested on a regular basis and is recommended not to exceed twelve hours per week.

#### 4.4 Wages<sup>vi</sup>

- Wages, benefits and overtime compensation shall at the very least comply with national legislation, industry standards and collective agreements. In any event wages and compensation for regular working hours should always be enough to meet basic needs and to provide some discretionary income.
- In the case of deductions from wages as a disciplinary measure, this will be permitted only under the conditions and to the extent regulated by law or collective agreement.

#### 4.8 Work environment and safety<sup>x</sup>

The supplier shall define responsibilities, and establish and follow procedures to prevent accidents and work-related injuries.

- The supplier shall at least comply with the minimum standards according to national and local laws and regulations regarding the work environment.

#### 4.5 Forced labour<sup>vii</sup>

- No form of forced labour or labour linked to any form of punishment is permitted. This requirement pertains to all employees, irrespective of employment condition.
- No employee may be forced to hand over valuables or identification papers to their employer.

#### 4.6 Child Labour<sup>viii</sup>

- Orfer does not accept child labour. Every child shall be protected from economic exploitation and performing any work that may be dangerous, have an adverse effect on the child's education or be harmful to the child's health and development.
- The term 'child labour' refers to work carried out by a child who is under 15 years of age, or under 14 years of age in those countries specified in Article 2.4 of ILO Convention 138.
- Young workers under 18 may not work at night or in hazardous conditions.

#### 4.7 Equal Treatment<sup>ix</sup>

- Orfer does not accept discrimination, intimidation, oppression or harassment in any form.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

### 5. Follow-up and enforcement

Version	2.0
Date	1.4.2024
Responsibility	CPO



Enforcement of this Supplier Code of Conduct is important to Orfer's business.

- It is the supplier's responsibility to ensure that the content of this Supplier Code of Conduct is implemented. We also expect all suppliers to have appropriate procedures to ensure that their own suppliers of products and services are in compliance with the content of our Supplier Code of Conduct.

## 5.1 Supplier audits

- We conduct supplier audits to ensure that suppliers adhere to our Code of Conduct. Audits may be conducted unannounced and by an external party. The supplier must respond to audits within the requested timeframe.
- We may also conduct pre-auditing questionnaires for suppliers, which must be completed within the requested timeframe.

## 5.2 Consequences

- Suppliers must have clear and easily accessible whistleblowing channels through which stakeholders can report suspected wrongdoing, such as illegalities, unethical acts, safety issues, and fraud.
- If the supplier fails to comply with the terms of this Supplier Code of Conduct, we may terminate the business relationship if improvements are not made within an agreed period

*Approval of Orfer's code of conduct for suppliers*

*Date:* \_\_\_\_\_  
*Company:* \_\_\_\_\_  
*Signature:* \_\_\_\_\_

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<sup>i</sup> References to relevant ILO and United Nations conventions for each area of the code, including web link, are found below

<sup>ii</sup> [UN Convention Against Corruption](#)

<sup>iii</sup> [Universal Declaration of Human Rights](#)

<sup>iv</sup> ILO Conventions No. [87](#), [98](#), [135](#) ja [154](#)

<sup>v</sup> ILO Convention No. [1](#) ja [14](#), ILO

Recommendation No. [116](#)

<sup>vi</sup> ILO Convention No. [26](#), [95](#) ja [131](#)

<sup>vii</sup> ILO Conventions No. [29](#) ja [105](#)

<sup>viii</sup> [UN Convention on the Rights of the Child](#)

ILO Conventions No. [138](#), [182](#), ILO

Recommendation No. [146](#)

ja [UNICEF's Children's Rights and Business Principles](#)

<sup>ix</sup> ILO Conventions No. [100](#), [111](#), [143](#), [169](#), [183](#) ja [UN Convention on Discrimination Against Women](#)

<sup>x</sup> ILO Convention No. [155](#), [184](#) ja ILO

Recommendation No. [164](#)