

# FDPARTS SUPPLIERS' CODE OF CONDUCT

for Responsible Purchasing

September 2025





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#### A WORD FROM THE CEO

At FDPARTS, we believe strong partnerships are built on shared values. By working together, we can drive progress, reduce risk, and create long-term value for all.

Our **Suppliers' Code of Conduct** sets clear expectations for ethical and responsible behaviour across our supply chain and how we do business.

This Code is a key part of our **VSME strategy** and reflects our commitment to **ESG principles** – protecting the environment, respecting human rights, and ensuring good governance.



September 2025

Sincerely,

Søren Ketnel Fussing CEO, FDPARTS A/S

#### **OBJECTIVES AND RECIPIENTS**

FDPARTS is committed to being recognised as a professional and responsible company, operating in full alignment with international standards and best practices.

This Code of Conduct is part of the **Voluntary Reporting Standard for SMEs (VSME)** – a framework that FDPARTS is implementing across the company. This will allow us to work with larger companies subject to the <u>Corporate Sustainability Reporting Directive (CSRD)</u>.



As part of this commitment, FDPARTS has established a set of guidelines to promote responsible conduct among its suppliers. These guidelines are formalised in this **Supplier's Code of Conduct**, which outlines the minimum standards that all suppliers are expected to meet. This Code does not replace any applicable national or international legislation, which Suppliers must fully comply with at all times.

The principles in this Code are based on internationally recognised agreements such as the 10 Principles of the United Nations Global Compact, the core and priority conventions of the International Labour Organization (ILO), as well as key declarations on human rights and children's rights.

With this Code, FDPARTS A/S aims not only to protect its own business interests but also to promote a culture of accountability and sustainability among all stakeholders in the supply chain, through responsible due diligence.

Key focus areas include human rights, environmental protection, responsible sourcing, business ethics, and ESG compliance.

This Code applies to **all Suppliers** of FDPARTS. Furthermore, we encourage our Suppliers to ensure that their own subcontractors and business partners are also made aware of, and comply with, the ESG and CSR principles outlined in this document.



#### THE SUPPLIERS' COMMITMENTS

#### 1. Compliance with national and international laws and regulations

Our Suppliers are expected to comply with all laws and regulations, including regulations related to exports applicable to their activities, in each country in which they carry out their activities. In the absence of such standards, as a minimum they are expected to ensure compliance with the commitments detailed in this code in as far as possible.

#### 2. Respecting human rights in the workplace

Our Suppliers agree to respect and ensure respect for human rights in their professional activities. They must ensure that their employees' working conditions are decent and comply with the applicable local and international legislation.

#### 3. Banning child labour

Our Suppliers must not employ persons under the minimum age required by law in each country in which they carry out their activities. Consequently, they are invited to check the age of their employees by all legal means. The minimum working age set by the ILO is 15 years old, except in certain countries for which child labour from the age of 14 onwards is authorised. The age limit is also dependent upon the strenuousness of the job in question. People under the age of 18 should not carry out any night working, any dangerous work or any activities which may be harmful to their physical or mental health.

#### 4. Avoiding the use of forced labour or slavery

Our Suppliers agree not to have any work performed by or to require any services from an individual under the threat of any penalty or punishment of any form, and for which this individual has not volunteered of his own free will. The confiscation of employees' identity papers and the payment of a deposit or bond at the time the person is hired are also practices which are both prohibited. Our Suppliers may not practice or benefit from any form of servitude, human trafficking or slavery.

#### 5. The payment of fair wages

Our business partners will respect the right of employees to receive fair remuneration, which should be sufficient to guarantee a decent standard of living for them and their families. The remuneration paid to the employees must be at



least equal to the minimum fixed salary set by the legislation of the country in which the work is performed. It must be paid on time, regularly and fully, in a currency recognised as legal tender.

#### 6. Guaranteeing decent working hours

Our Suppliers will ensure that their employees work to set business hours and benefit from holiday and leave entitlement pursuant to the legal and statutory provisions in force in the country in which they perform their activities. According to local regulations and the status applicable to the employees concerned, overtime work must be voluntary, paid at a higher rate and should not pose a professional risk for the employee. Our Suppliers may also agree by means of a collective agreement or other agreement that all or part of this additional remuneration will be replaced by equivalent compensatory time off.

# 7. Guaranteeing the absence of discrimination, harassment and inhumane treatment

Our Suppliers agree that they will not carry out any form of discrimination based on gender, age, origin, religion, sexual orientation, physical appearance, state of health, family situation, political opinions, pregnancy status, trade union membership, disability or any other form of discrimination, including at the time of recruitment or for any access to training or a promotion, etc. All forms of harassment, threats of violence, abuse, coercion and corporal punishment directed at employees are inadmissible and intolerable. Our Suppliers guarantee that their employees will always receive decent and human treatment.

#### 8. Protecting health and guaranteeing hygiene and safety in the workplace

Our Suppliers are expected to analyse and assess potential health and safety risks within their companies to apply appropriate processes to avoid and remedy these, where applicable. Training must be organised for the employees exposed to such risks. Our Suppliers will ensure that the procedures to ensure suitable hygiene and safety conditions are respected in the workplace and among other things will check the compliance of the facilities vis-a-vis the country's standards regarding indoor air quality (ventilation), sound levels, temperature and lighting. Fire protection and firefighting equipment must be in place and must be serviced at regular intervals.

Our Suppliers agree to (i) identify and reduce their employees' exposure to risks related to the company's activities and (ii) to improve the protection of employees



in the event of an accident, including by signing up to insurance schemes. Our Suppliers are expected to provide employees with appropriate individual and collective protective equipment.

# 9. Guaranteeing and respecting the freedom of association and trade union freedom

Our Suppliers agree to respect and guarantee freedom of association and trade union freedom for their employees as provided by the applicable national and international laws. Our Suppliers will ensure that they always maintain a collaborative attitude vis-a-vis their employees and will seek to avoid conflicts through effective ongoing social dialogue.

#### 10. Ensuring the confidential nature of information

Our Suppliers should respect the confidential nature of the non-public data obtained during their commercial dealings with FDPARTS. No confidential information belonging to FDPARTS may be revealed, transmitted, divulged or used by them other than regarding our Business Relationship.

FDPARTS' confidential information must remain strictly confidential, even following the termination of its relationship with the relevant Suppliers.

The Suppliers will protect all professional data and information received from FDPARTS throughout the Business Relationship and even after the termination of the said relationship. Individual information concerning FDPARTS gathered or held by our Suppliers must be strictly subject to the principle of limited use.

#### 11. The fight against corruption and money laundering

Our Suppliers are expected to fight corruption in all forms in every country in which they carry out their activities. They may not directly or indirectly offer, promise, grant or demand illegal payments or other undue benefits to/from the public authorities to obtain or maintain a contract or any other illicit advantage. They must avoid any extortion, fraud or bribery.

Our Suppliers must combat money laundering in every country in which they carry out their activities. They must show heightened vigilance concerning financial transactions undertaken to detect any irregularities.



#### 12. The fight against anti-competitive practices

Our Suppliers are expected to take all measures to avoid anti-competitive practices. Among other things they agree not to participate in cartels and/or abuses of a dominant position. They should avoid sharing any sensitive information with third parties, and with FDPARTS' competitors.

#### 13. Respecting and protecting the environment

Our Suppliers agree to comply with national or international legal and regulatory requirements regarding environmental law. They should adopt a precautionary approach: detecting, identifying and assessing potential environmental risks and taking all appropriate measures to reduce or eliminate them.

Our Suppliers should be working on minimising their impact on the environment

- By contributing to efforts to combat the climatic crisis,
- By reducing their consumption of energy, their CO2 emissions and their water consumption,
- By limiting their impact on biodiversity in the use of raw materials and the production of waste and emissions
- By reducing the use of non-renewable resources or products which are not environmentally friendly.

As part of their innovation processes, Suppliers should encourage the development of products which have the lowest possible environmental impact throughout their entire life cycle.

Our Suppliers agree to:

- Report the weight of both plastic and cardboard used in the packaging of individual products.
- Favour the use of materials designed to be environmentally friendly. E.g.
   FSC-certified cardboard and environmentally friendly packaging such as recyclable, biodegradable, or recycled materials.
- Ensure that their products do not contain banned raw materials or those obtained illegally.



- Identify and manage any chemical products or materials which present a
  risk if discharged into the environment. Our Suppliers must ensure that the
  handling, transport, storage, recycling or re-use and disposal takes place in
  a risk-free manner and in compliance with the regulations.
- Aim to reduce the wastewater and solid waste produced by their activity and process these in compliance with the laws governing their discharge or elimination.
- Aim to reduce atmospheric emissions arising from corrosive products, particles and volatile chemical substances which deplete the ozone layer, in compliance with the applicable legislation.
- Reduce or dispose of waste of all types, including through recycling, composting, the reuse of materials, in addition to limiting or reducing packaging.

# IMPLEMENTATION OF AND COMPLIANCE WITH THE CODE

FDPARTS' objective is that this Code of Conduct for Responsible Purchasing should be an integral part of all relationships with FDPARTS and its Suppliers, and that it should be applied at every stage of the Business Relationship, in compliance with the above-mentioned principles.

Suppliers are expected to have read and fully familiarised themselves with the FDPARTS Suppliers' Code of Conduct.



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