## **BUSINESS PARTNER CODE OF CONDUCT**

Revision June 23rd, 2021



## **INTRODUCTION:**

As a member of the wind energy and composite solution supply chain RewAir is dedicated to reducing the installed cost of wind turbines and to decreasing the environmental impact of our activities, and to do so in a sustainable, transparent, and professional manner. To achieve this goal, we are guided by our high standards on how we do business. We consider our Business Partners¹ to play a key role in supporting our mission. To support our Business Partners in following RewAir's standards, we have developed this Business Partner Code of Conduct.

RewAir is guided by standards introduced by our customers, and by relevant international frameworks such as The International Bill of Human Rights, the UN International Covenant on Economic, Social, and Cultural Rights, the core conventions of the International Labour Organisation (ILO) including CO29, CO87, CO98, CO100, CO111, CO138, and CO155, the Guidance for Responsible Mineral Supply Chains stated by The Organisation for Economic Cooperation and Development (OECD), The Ten Principles of the UN Global Compact, and the World Economic Forum's Partnering Against Corruption Initiative (PACI). RewAir is committed to follow and to work for continuous improvement in these areas.

## **SCOPE:**

This Business Partner Code of Conduct is valid for business partners supplying RewAir Holding A/S and its controlled subsidiaries ("RewAir").

This Business Partners Code of Conduct outlines the minimum requirements our Business Partners must respect when conducting business with RewAir.

This Business Partner Code of Conduct applies to all Business Partners. Business Partners are responsible for; ensuring compliance with this Business Partner Code of Conduct; avoiding causing or contributing to adverse impacts in their business operations, supply chain and local communities; and where appropriate, undertaking appropriate due diligence measures on their own business partners to maintain the standards outlined in this Business Partner Code of Conduct.

## **COMPLIANCE:**

Business Partners must comply with all applicable national and local laws, rules, and regulations. If there is a difference between the terms of the Code of Conduct and national laws or other applicable standards, Business Partners must adhere to the higher requirements. Business Partners shall maintain appropriate records to demonstrate compliance with the requirements of the Code of Conduct. Records must be available to RewAir upon request. If the Supplier does not comply with the minimum requirements set out in this Code of Conduct, RewAir has the right to terminate the business relationship with the Business Partner.

If any inappropriate behavior or practices are observed or suspected when dealing with a RewAir employee, Business Partners may report this to RewAir Group Management; contact details can be found on <a href="https://www.rewair.com">www.rewair.com</a>.

<sup>&</sup>lt;sup>1</sup> "Business Partners" can include suppliers, contractors, consultants, agents and any other business partner acting for or on behalf of RewAir.

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## THE BUSINESS PARTNER MUST:

## 1. RESPECT HUMAN RIGHTS

## **Forced Labor**

- Not participate in, or benefit from, the use of forced or compulsory labor, or human trafficking in any form. All labor must be voluntary.
- Ensure that employees have freedom of movement during their employment and are free to always terminate their contracts.

## **Child Labor**

Not employ workers under the age of 15 (or in those developing countries covered by the ILO
exception, 14 years of age), nor benefit from the use of child labor, and not employ young persons
under the age of 18 for hazardous work.

# Health & Safety in the Workplace

- Implement applicable occupational health and safety standards for both direct and indirect employees, and give employees mandatory training, information, and protective equipment necessary to perform their tasks safely.
- Take best possible emergency preparedness measures.
- Establish and use a health and safety management system, which includes accident reporting.
- Ensure that, if providing housing for its workers, such housing is safe, and the living conditions meet international health and safety standards.

## **Working Hours, Wages & Benefits**

- Comply with applicable laws, industry standards and relevant collective agreements on wages, working hours, breaks, public holidays, leave and compensation in case of overtime.
- Provide employees with an employment contract that is written, understandable and legally binding, and in a language the Employee understands.

## Non-Discrimination & Non-Harassment

- Not base recruitment, remuneration, training, advancement, benefits, discipline, dismissals, and
  any other employment-related decisions on characteristics that are not related to their merit or the
  inherent requirements of the job.
- Protect employees from harassment, whether committed by their colleagues or by management, and provide appropriate grievance channels.
- Not hold or destroy an employee's identity or immigration documents.

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## **Freedom of Association & Collective Bargaining**

- Respect the right of all employees to form and join (or not join) a trade union, select their own representatives and to bargain collectively, and not interfere with or restrict this right.
- Promote alternate channels for workers to raise concerns and discuss with management, where freedom of association is limited.
- Bargain with employee representatives in good faith.

# **Managing Chemicals**

 Not use materials and chemicals listed in the RewAir "Prohibited and Restricted Substance Document" for all products delivered to RewAir. The prevailing list can be found on <a href="https://www.rewair.com">www.rewair.com</a>.

# 2. HAVE ZERO TOLERANCE FOR BRIBERY, CORRUPTION, CONFLICTS OF INTEREST & DELIBERATE TAX EVASION

- Not, either directly or indirectly, offer, grant, promise or request or accept anything of value made
  to a public official or to a private sector employee, with the intention to influence that person's
  behavior and obtain an improper advantage in the conduct of business. This prohibition includes
  facilitation payments.
- Only offer gifts and business entertainment that are proportionate, within reasonable limits, and never with the intention of influencing a RewAir employee.
- Only offer to cover reasonable business travel expenses for a RewAir employee, and never with the intention of influencing a RewAir employee.
- Avoid all conflicts of interest that may adversely influence business relationships.
- Ensure that all documents, communications, and accounting are accurate and honest and do not take or participate in any actions that may be viewed as tax evasions or the facilitation of tax evasion.

## 3. RESPECT THE ENVIRONMENT

- Identify and meet all relevant environmental legislative and regulative requirements, maintain all
  applicable licenses, registrations and permits, and work according to an environmental
  management system delivering resource efficiency, as well as emergency response preparedness.
- Evaluate the environmental performance of its activities, minimize environmental impact, and make continuous improvements in environmental protection.

## 4. RESPECT CONFIDENTIALITY, INTELLECTUAL PROPERTY & DATA PRIVACY RULES

- Protect and respect the intellectual property and confidential information of RewAir and third
  parties and ensure that the intellectual property and confidential information of RewAir or third
  parties is used solely as explicitly permitted.
- Protect and respect privacy rights. Only collect, process, disclose or store personal data if it has a
  legitimate business purpose, and ensure that necessary agreements are in place before collecting,
  processing, or transferring personal data to third parties.

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