

TROLDTEKT SUPPLIER POLICY

**This Supplier Policy describes the required code of conduct
for suppliers or external service providers**

Introduction

Troldtekt and its affiliates (“Troldtekt”) are committed to conducting their business activities with integrity, and in a responsible and ethical manner. Troldtekt expects the same high standards of its contractors, suppliers, and other business partners.

This Supplier Policy (the “Policy”) applies to all organisations that provide goods or services to Troldtekt (a “Supplier” or “Suppliers”).

The Policy sets out Troldtekt’s expectations of Suppliers, generally in terms of business practices, and specifically with respect to:

- Applicable law;
- Business integrity;
- Environmental Responsibility;
- Ethical employment practices; and
- Anti-Bribery and Corruption.

Where the requirements of this Policy exceed the minimum standards prescribed in the legislation applicable to a Supplier, the Supplier is expected to adhere to the Policy requirements in addition to the applicable legislation.

Suppliers are expected to maintain appropriate processes and systems to fulfil their obligations of this Policy and to be able to evidence in writing adherence to the requirements contained herein.

Compliance with Applicable Law

Each Supplier shall comply with all applicable laws, statutes, regulations, and codes as are from time to time in force.

Business Integrity

Troldtekt’s Objectives

Troldtekt recognises the safety, health, environmental, social, legal and ethical impacts of all supply and procurement decisions, and will involve its suppliers in addressing any issues

that may arise. Troldtekt is committed to excellence in safety, health and environmental management. Troldtekt expects its suppliers to assist in minimising any negative effects and neutralising any risks.

Troldtekt will develop supply strategies and processes that attempt to achieve best value for money in procuring the goods and services that meet its needs and are within legal and ethical standards.

Troldtekt will develop relationships that are the most appropriate to gaining a mutual understanding of the needs of Troldtekt whilst understanding Supplier capabilities. These relationships will ensure consistency of quality, reliability, availability, timeliness, fitness for purpose and performance at affordable cost.

Troldtekt will work with suppliers, offering appropriate support, and make reasonable demands in relation to the improvement of existing standards.

Troldtekt expects both its employees and those of its Suppliers to transact with integrity in a trustworthy and responsible manner.

Troldtekt expects both its employees and those of its Suppliers to act impartially and objectively in all their purchasing activities and to keep written records where appropriate to demonstrate that their actions have been fair and above reproach.

Troldtekt expects its employees to adopt best practice, when issuing competitive tenders or invites supplier quotes, judging bids on the merits of their competitive offerings and total life cycle cost. Troldtekt expects both its employees and those of its Suppliers to maintain an unimpeachable standard of integrity in all their business relationships and to foster the highest possible standards of professional competence in all their supply activities.

Troldtekt expects its employees and Suppliers to comply with the law of the countries in which they operate and with which Troldtekt deals, and in all contractual obligations incurred by or on behalf of Troldtekt.

Supplier Requirements

Suppliers must ensure that their products and services are produced and delivered in line with all laws, local regulations and best industry standards and practices.

Suppliers are expected to assign responsibility for internally communicating and implementing this Troldtekt Supplier Policy to an appropriate manager or responsible person and, if requested by Troldtekt, make a written statement of intent regarding the policy, including how it will be implemented and communicated to its employees and suppliers.

If requested by Troldtekt, Suppliers must report progress on the implementation of this Policy by describing actions taken and detailing future planned activity.

Suppliers must assume responsibility for the adoption and implementation of acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards under which products are made and services provided. This includes all work contracted or sub-contracted.

Suppliers are encouraged to highlight to Troldtekt any areas of legal or ethical concern so that both organisations can have a constructive dialogue about resolving any gaps and deficiencies.

Suppliers should seek continuous improvement in the way the company produces and delivers its products and services and manages its supply chain relationships.

Environmental Responsibility

Troldtekt is committed to working holistically with sustainability, playing a leadership role in tackling climate change; placing emphasis not only on minimizing the environmental impact, but on optimizing resource consumption and processes.

Troldtekt works strategically with sustainability through our Cradle to Cradle certification, and is actively part of Kingspan's Planet Passionate sustainability programme. Troldtekt requires all of its Suppliers to support these efforts in this mission and to consequently conduct their operations in such a manner as to cause minimal environmental impact and to continually improve their operations so as to reduce that environmental impact. This implies that our suppliers contribute with documentation of their production and compounds of the goods either directly or via an independent third party.

Environmental Management System

Suppliers shall carry out operations with care for the environment and must comply with all relevant laws and regulations regarding the protection and preservation of the environment. All required permits, licenses and registrations will be obtained, maintained and kept up to date.

Suppliers shall maintain and operate an Environmental Management System (EMS) covering their business operations and manufacturing processes, as applicable. The content of this EMS shall be in line with the requirements of ISO 14001, covering:

- Environmental policy;
- Planning;
- Implementation and operation;
- Checking; and
- Management review.

Resource Conservation

Suppliers shall undertake best practice actions with regard to energy and water management and conservation, to minimise the environmental impact of their operations processes.

Suppliers should engage in the development and use of climate-friendly products/materials and processes, looking at the principals of circularity, to reduce virgin and non-renewable resource consumption.

Suppliers should monitor and report on resource consumption across their operations, including energy, water, and materials.

Waste

Suppliers shall ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects, for all waste streams, including hazardous waste.

Suppliers shall dispose of waste responsibly, using approved, registered waste contractors.

Suppliers should observe the waste hierarchy, and minimize waste within their operations and supply chain, where practical.

Localised Emissions

Suppliers shall monitor all localised emissions to their operations. Suppliers should seek to reduce air emissions and water discharge within their operations where practically possible and strive to achieve best practice with regards to the quality of emissions beyond legislation.

Ethical Employment Practices

Troldtekt supports the protection of human rights and expects its Suppliers to observe the International Bill of Human Rights¹. Where a Supplier is found not to observe the International Bill of Human Rights ("IBHR"), it shall be immediately required to change its work practices so as to place them in-line with the objectives of the IBHR, with a failure to do so constituting a material breach of the contractual relationship between the parties. Troldtekt Suppliers are expected to support Troldtekt's commitment to respect human rights through:

¹ Comprising the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil Rights.

Child Labour

Troldtekt is guided by the International Labour Organisation (“ILO’s”) Core Conventions, and as such requires its Suppliers not to utilise any form of child labour in their business operations.

Anti-Slavery

Suppliers are required to ensure that all work relating to their operations is completed voluntarily and without slavery, servitude, forced or compulsory labour or human trafficking. Workers shall have the freedom to terminate their employment with the respective Supplier at any time without penalty, upon giving reasonable notice.

Compliance with Immigration Laws and Regulations

Suppliers must ensure that all employees have the legal right to work, and any migrant workers should be in possession of a valid work permit issued by the relevant authority.

Working Hours

Suppliers are required to comply with all applicable laws pertaining to working hours, but at the very minimum must ensure that working hours are not excessive and that no worker shall be made to work overtime under the threat of penalty, dismissal, denunciation or as a disciplinary measure.

Working Environment

Suppliers will provide their employees with a workplace free of discrimination, harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.

Suppliers will comply with all applicable health and safety regulations

Suppliers shall have adequate management systems to predict hazards and protect the health and safety of all people at their place of work and under their control. This must include a formal and regular assessment of risks, implementation of safe systems of work, the reporting of incidents and a programme of continuous improvement in safety performance.

Suppliers shall protect their employees from any workplace hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees.

Equality

Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.

Anti-Bribery and Corruption (“ABC”)

Troldtekt does not tolerate bribery and corruption in any form. Troldtekt expects that its Suppliers shall maintain the standards set by Troldtekt, and to that end, Troldtekt requires its Suppliers to ensure that its employees are prohibited

from offering, promising, requesting, accepting or agreeing to accept anything of value to or from any person for the purpose of improperly obtaining a commercial advantage or inducing the other party to act in a manner that is improper. Troldekt also requires its Suppliers to maintain appropriate policies to prevent bribery and corruption.

Troldekt requires its Suppliers not to make facilitation payments irrespective of local custom, to include appropriate ABC clauses in contractual arrangements within the Suppliers' supply chain.

Raising Concerns

Troldekt is committed to conducting its business activities to the highest standards of integrity. In support of this objective, Troldekt maintains a confidential independent service for raising concerns and expects its Suppliers to strongly encourage their employees to raise concerns through this service should they encounter conduct of Troldekt or its employees which fall short of the standards contained in this Policy.

The Confidential Independent Service for Raising Concerns can be accessed via our webpage www.troldekt.dk/suppliers.

This Troldekt Supplier Policy is hereby accepted and agreed by

Name of Company

Date of Signature

Name of signee

Signature