



# CODE OF CONDUCT

## WENCON APS

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# INTRODUCTION TO CODE OF CONDUCT

The purpose of the Code of Conduct is to set the standards for the business ethics, which all employees in WENCON must adhere to. The Code of Conduct is meant to answer most questions and dilemmas you face as an employee or partner of WENCON. However, if you are in doubt as to how to interpret the Code of Conduct or how to apply it to a situation, please contact your management.

*We wish to guide our employees on how to make decisions that are in line with our values and our commitments to international principles and standards. Our Code of Conduct sets global standards for how we as a company engage with our colleagues, customers, suppliers, communities, authorities, and other stakeholders.*








Keld Willberg  
CEO

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# WENCON® values

Partnership 	Trustworthy 	Quality 	Sustainability 	Integrity 
<p>With our global network of partners, we are dedicated to supporting our customers worldwide.</p> <p>We wish to encourage and contribute to a positive dialogue.</p>	<p>Trustworthiness is a key value at Wencon.</p> <p>We aim to always help to build and maintain strong relationships with customers, employees, and partners.</p> <p>We operate in an ethical and moral manner.</p>	<p>Quality is a significant part of our daily routine, and we strive to improve our standards, to deliver the highest quality to our customers and partners.</p>	<p>Through our solutions, we focus on reducing the overall environmental impact.</p> <p>We help our customers to calculate and document actual CO2 savings.</p>	<p>We aim to be transparent and consistent in all business practices and consistently adhering to ethical standards.</p>

## What is expected from our partners?

### Our partners should:

- Acquaint themselves with the Wencon values and what lies behind them.
- When interacting with colleagues, suppliers, customers, or any other stakeholder, keep the Wencon values in mind and act accordingly.

## Wencon Whistleblower Policy

We welcome feedback and concerns from external parties regarding our Code of Conduct. If you believe that any behavior or practice is not in compliance with this, or if you have suggestions for improvement, please refer to and follow our [whistleblower process available on our website](#). All reports and comments will be taken seriously, and we are committed to addressing them promptly and respectfully.

# Human rights



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## What will Wencon do?

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In WENCON we are committed to respecting human rights as described in the UN International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. This commitment applies to all aspects of the company's operations and business relationships. Examples of how we uphold these rights include, but are not limited to:

- The right to equality and non-discrimination.
- The right to privacy and personal data protection.
- The right to freedom of expression and opinion.
- The right to fair treatment and protection from abuse or exploitation.

## **WENCON will:**

- Continuously assess the impact of its operations and business relationships on human rights and develop the means to address and prevent actual and potential adverse impact respectively, as well as proactively contribute to the areas where we have the most influence and leverage.

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## What is expected from our partners?

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- The cooperating partners shall respect internationally proclaimed UN human rights and shall avoid being complicit in human rights abuses of any kind. The cooperating partners shall respect the personal dignity, privacy, and rights of everyone.
- We expect our partners/business relationships to continuously assess the impact of its operations and business relationships on human rights and prevent or mitigate adverse impacts they may cause or contribute to, and to promptly manage any severe adverse impacts, should such impacts occur.
- We expect our partners/ business relationships to make demands on the next tier in their value chain.

# Labour



## *Remuneration and employment conditions*

What will Wencon do?	What is expected from our partners?
<ul style="list-style-type: none"> <li>All Wencon employees has a written and legally binding agreements including wages, overtime wages, sick leave, and other elements of compensation. The agreements are fulfilling Danish laws and regulations.</li> </ul>	<ul style="list-style-type: none"> <li>The cooperate partners shall ensure that all workers have written and legally binding agreements of employment setting out employment conditions (incl. minimum wages, overtime wages, sick leave, and other elements of compensation in a language understandable to the worker.</li> </ul>

## *Working hours*

What will Wencon do?	What is expected from our partners?
<ul style="list-style-type: none"> <li>We aim to create work-life balance in the workplace, and we will also help to improve employee well-being and productivity by ensuring that employees have enough time to rest.</li> <li>We will create flexible working arrangements, such as telecommuting or flexible schedules, to accommodate different working styles and needs.</li> </ul>	<ul style="list-style-type: none"> <li>We expect that the cooperating partners do not require employees to work more than 60 hours per week including overtime, or the limits on regular and overtime hours allowed by local law.</li> <li>Employees with unusual working conditions may be exempted from this general requirement when covered by specific national or international legislation, however over the course of 12 weeks any employee shall not on average, be required to work more than 60 hours per week, including overtime.</li> </ul>

## *Freedom of association and the right to collective bargaining*

What will Wencon do?	What is expected from our partners?
<ul style="list-style-type: none"> <li>Ensure that employees are free to form, join, or assist labour organizations of their own choice, and that they are not subject to discrimination for their participation in such organizations.</li> <li>Recognize the right of employees to engage in collective bargaining with their employer.</li> </ul>	<ul style="list-style-type: none"> <li>We expect that the cooperating partners do not prevent employees and other workers from associating freely with any lawful workers' association or collective bargaining association of their choice.</li> </ul>

## *Forced labour*

What will Wencon do?	What is expected from our partners?
<ul style="list-style-type: none"> <li>Wencon is committed to ensuring that all work within our operations is voluntary and free from coercion, threats, or punishment.</li> <li>We work to prevent any form of slavery, bonded labour, or human trafficking in our operations and supply chain.</li> </ul>	<ul style="list-style-type: none"> <li>Cooperating partners shall not use forced, bonded, or involuntary labour, and must ensure that all work is performed voluntarily and under fair conditions.</li> </ul>

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### *Child labour*

What will Wencon do?	What is expected from our partners?
<ul style="list-style-type: none"> <li>• <b>Follow the rules of Child labour in Denmark:</b> <ul style="list-style-type: none"> <li>- The Danish Working Environment Authority (WEA) is responsible for enforcing laws and regulations, and for ensuring that employers comply with the rules related to child labour.</li> <li>- The WEA conducts regular inspections to ensure that employers are not using child labour, and that children who are working are not being subjected to hazardous or unhealthy working conditions. Employers who violate the laws related to child labour can face fines, penalties, and other legal action.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• We expect that the cooperating partners ensures that no person shall be employed at an age younger than 15 (or 14 where the law of the country permits) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.</li> <li>• The cooperating partners shall protect young workers of legal working age, up to the age of 18, from any type of employment or work which, by its nature or circumstances in which it is carried out, is likely to jeopardize their health, safety or moral.</li> </ul>

### *Discrimination*

What will Wencon do?	What is expected from our partners?
<ul style="list-style-type: none"> <li>• Wencon will not discriminate based on: <ul style="list-style-type: none"> <li>- Race or skin colour.</li> <li>- Religion or creed.</li> <li>- Gender or gender expression.</li> <li>- Age.</li> <li>- National origin or ancestry.</li> <li>- Mental or physical disability.</li> <li>- Marital status.</li> <li>- Sexual orientation or social status.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The cooperating partners shall treat employees equally and fairly. Any form of harassment or discrimination shall not be tolerated.</li> <li>• We expect that the cooperating partners will prohibit negative discrimination based on gender, ethnic background, sexual orientation, religion, or age.</li> </ul>

### *Harassment and disciplinary measures*

What will Wencon do?	What is expected from our partners?
<ul style="list-style-type: none"> <li>• We will create a positive and respectful work environment and ensure that all employees are treated fairly and equitably.</li> </ul>	<ul style="list-style-type: none"> <li>• We expect that the cooperating partners does not use or permit the use of corporal punishment or other forms of mental or physical coercion, disciplinary actions or engage in sexual harassment.</li> </ul>

# Health and safety



## What will WENCON DO?

- WENCON will continuously work on improving the health and safety environment for all employees.
- We will make sure all safeguards are in place.
- We will take care of our own and our colleagues' safety.
- Provide health insurance for all employees.

### Precautions against accidents while working with epoxy products

In the event of damage to the products, the following procedure applies:

- Use personal protective equipment (gloves)
- Provide adequate ventilation.
- Avoid inhalation of gas/fumes/vapours/aerosol mists.
- Spills are contained and collected with non-flammable absorbent material, e.g., sand or soil, and placed in a container at the "machine shop" and disposed of in accordance with applicable regulations.
- Thoroughly clean dirty objects and the floor in compliance with environmental regulations. Preferably clean with detergents, avoid the use of solvents. The recorded material is placed in a container at the "machine shop" and disposed of in accordance with applicable regulations.

## What is expected from our partners?

- The cooperating partners shall secure that the workers have a healthy and safe working environment in accordance with internationally recognized standards.
- We expect the cooperating partners to continuously improve working conditions and reduce workplace-related risks and hazards by e.g. setting targets and conducting appropriate training.

# Environment and sustainability



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## What will WENCON DO?

- We will keep our work environment clean, orderly, and safe.
- We will handle and dispose of all materials properly, safely, and lawfully.
- We will protect the natural environment and cultural heritage.
- We will comply with Danish environmental regulations and laws.
- We will continue to minimize any possible environmental impact.
- Wencon is continuously working towards UN Goals SDG 12, 13 & 17. These efforts are further described and elaborated in our ESG Report.

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## What is expected from our partners?

- Partners are encouraged to share knowledge, ideas, and initiatives that support sustainable development and long-term environmental goals.
- We expect our partners/business relationships to continuously assess the impact of its operations and business relationships on human rights and prevent or mitigate adverse impacts they may cause or contribute to, and to promptly manage any severe adverse impacts, should such impacts occur.
- We expect our partners/business relationships to make demands on the next tier in their value chain.

# Corruption and bribery



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## What will WENCON DO?

- Wencon will conduct our business in a fair, transparent and legal manner.
- Wencon will not pay or receive any kind of bribes.
- Wencon will not accept any agents/distributors to pay or receive any kind of bribes on behalf of or interest of Wencon.

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## What is expected from our partners?

- The cooperating partners shall under no circumstances cause or be part of any breach of general or special competition regulations, such as illegal cooperation on pricing, illegal market sharing or any other behaviour that is in breach of relevant competition laws.
- Our partners should not pay or receive any kind of bribes.

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## *Conflict of interest*

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## What will WENCON DO?

- Help to promote transparency and integrity within an organization or community.
- Help to ensure that decisions are made in the best interest of the organization or community, rather than the interests of any one individual or group.

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## What is expected from our partners?

- The cooperating partners are expected to disclose to Wencon Head Office at (Wencon@wencon.com) any situation that may appear as a conflict of interest and disclose to Wencon Head Office if any Wencon employee or leader under contract with Wencon may have an interest of any kind in the cooperation partner's business or any kind of economic ties with the cooperating partner or its employees.
- We expect our cooperate partners to avoid participation in or knowingly benefit from, any kind of corruption, extortion, or bribery.
- Consequently, the cooperate partners may not offer, promise, authorize or give anything of value to any public official in any country, or to any business partner, to gain any improper business advantage of any kind. In addition, the cooperating partner may not solicit or accept any form of bribe from any person.

# Personal data protection



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## Our important points:

- Lawfulness, fairness, and transparency of personal data processing.
- Data must only be collected for specified, explicit and legitimate purposes.
- Processing must be adequate, relevant, and limited to what is strictly necessary.
- Data must be accurate and, where necessary, kept up to date.
- Data must be retained no longer than is necessary.
- Security, integrity, and confidentiality of personal data must be maintained.
- The Company must be able to demonstrate its compliance with above principles.

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## What is expected from our partners?

- Collect, use, and store data in compliance with applicable laws, privacy principles and Wencon commitments.
- Respect individuals' privacy always.
- Never re-identify or attempt to re-identify anonymized data.

