

# Ethical Business Policy

## Code of Conduct

### Introduction

Vinga is committed to ensuring fair and ethical policies and practices in our Global Supply Chain. We are a socially responsible business and expect our partners to accept our Code of Conduct, which is essential to current and future cooperation.

Vinga's Code of Conduct is based on The United Nations Global Compact Principles.

Vinga is a member of Amfori-BSCI and in this capacity acknowledges the importance of social standards.

The Vinga Ethical Business Policy - Code of Conduct applies throughout the company and for all Stakeholders.

### 2. Definitions

**Child labor:** any work involving a child, which is mentally, physically, socially, or morally dangerous and harmful to children, prevents him or her from attending school or concentrating at school, or negatively impacts health, social, cultural, psychological, moral, religious and related dimensions of the child's upbringing.

**Involuntary Labor;** any work or service which people are forced to perform against their will, under threat of punishment.

**Discrimination:** all situations in which people are treated unequally, but specifically for those mentioned in the United Nations Global Compact principles.

**Trade Union:** A collective or gathering in which employees are organized to safeguard and improve their legitimate interests. The employer is not a member of this trade union.

Legitimate rights consist of but are not limited to wages, working hours, working standards, working conditions, sick leave, and holiday leave.

### 3. Principles

The following principles and definitions apply in our Ethical Business Policy.

#### Child labor

Vinga highly values the rights of children such as recognised in the United Nations Convention on the Rights of the Child.

Vinga does not use child labor in our operations or facilities. We do not tolerate any form of unacceptable treatment of employees, including but not limited to the exploitation of children, physical punishment abuse, or involuntary servitude.

We fully commit ourselves to applicable laws establishing a minimum age for employment to support and create a world where child labor should be non-existent. No labor is allowed in any of our operations of facilities for children under 16. For office positions in Sweden, the minimum age is 18.

#### Involuntary Labour

Vinga values employees' rights to choose their own profession and resign from employment if they so desire. Performance of work should occur according to a job profile and may not exceed unreasonable demands.

No force may be used towards employees by resorting to violence, intimidation, or illegal restriction of personal freedom, humiliation, corporal punishment, beating, or illegally searching or detaining employees.

Employees shall have the right to be employed on an equal basis, choose occupations, obtain remuneration for their employment, take rest, enjoy holidays, and obtain the protection of occupational safety and health. Additionally, the latter shall receive training in vocational skills, enjoy social insurance and welfare, and submit applications for settlement of employee disputes, and other rights relating to employees as stipulated by law.

### 3. Wages and Working Hours

Vinga acknowledges the rights of Employees to receive correct information and documentation according to legal requirements, relating to their employment.

Employees will receive a written contract on entering employment. The distribution of wages shall follow the principle of distribution according to equal pay for equal work. Wages shall be paid weekly or monthly to employees themselves in the form of currency. The wages paid to employees shall not be deducted or delayed without justification.

Working hours shall comply with national laws and benchmark industry standards, and not exceed prevailing international standards. Weekly working hours should not on a regular basis exceed 48 hours. Workers shall be provided with at least one day off for every 7-day period. Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week. i.e.. that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement or approved by a Trade Union. Workers shall receive overtime pay in accordance with relevant legislation.

#### **4. Right of Trade Union**

Vinga recognises that every employee has the right to safeguard or improve their legitimate interest by practicing in or organising trade unions.

Participation in and organising of trade unions should occur in accordance with the law and with respect to the ILO conventions of freedom of associations and trade union rights. Trade unions should independently conduct their activities in accordance with the law.

#### **5. Equality and non-discrimination**

Vinga strives to create a varied and balanced workplace, with space for employees of different backgrounds, ideas, and skills. We believe all people should be treated with respect regardless of their difference.

Therefore there shall be no discrimination in the workplace in hiring, compensation, access to training, promotion, termination, or retirement based on gender, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, veteran status, marital status, or any other protected class.

#### **6. Health and Safety**

Vinga is dedicated to maintaining a safe and productive workplace by preventing and minimizing the risk of accidents.

Rules, laws, and standards set by the govern-

ment on occupational health and safety must be followed and employees must be educated on occupational safety and health. Facilities must meet the standards stipulated by the government on occupational health and safety. In the case of a negative report, health and safety standards need to be improved within a reasonable time frame.

Employees engaging in specialised operations must receive adequate training and acquire qualifications and certifications to perform these special operations.

#### **7. Environmental Protection**

Vinga values the protection of the environment and the implementation of CSR standards for improvement.

Environmental standards and procedures are set by Vinga according to relevant (national and international) legislation, standards, and company policies. Goals that set environmental standards for the future, need to be followed at all times.

#### **8. Fair Business Practices**

Vinga works strictly according to anti-corruption practices and does not tolerate any breach of these practices.

#### **9. Compliance**

All stakeholders of Vinga, as well as mother/sister companies and subsidiaries, need to comply with the Vinga Ethical Business Policy - Code of Conduct. Any violation of this Policy is considered a serious matter and will be acted on by Vinga.

Suppliers receive a copy of our Ethical Business Policy - Code of Conduct and BSCI documentation containing relevant standards to stress the importance of our policies. Suppliers can be subject to audits to determine con-formity with this Policy.

In case of non-conformity, corrective actions will be suggested. In case of serious breaches and unwilling suppliers, the business can be terminated immediately.

## Statement concerning Ethical Sourcing

At Vinga, we are aware of our responsibility towards implementing ethical sourcing practices.

Concerning business and corporate Ethics, Vinga distinguishes ethical and moral principles that can arise in a business environment. These ethics apply to the conduct of both businesses and individuals.

For Vinga ethical Sourcing means working according to standards set by various institutions, as mentioned in this report, to avoid materials that are heavily polluting, hazardous and obtained in conflict areas, and producers that trade in these materials or are involved in other unethical conduct.

At Vinga we follow our ethical sourcing standards, and we expect our suppliers and all sub-tier contractors to follow these same standards. Suppliers are responsible for performing due diligence to ensure these standards are met.

Vinga hereby states that:

- In dealing with our suppliers/vendors and partners we maintain a high ethical standard and do not involve ourselves with parties who infringe on our business ethics;
- Our products are free from hazardous substances such as AZO (aluminium zinc oxide), Chromium VI, Formaldehyde and heavy metals;
- Our goal is to work with more suppliers/vendors and partners who uphold safety and environmental measures in their business and production standards, thus ensuring a safe and hazard free workplace and environment according to BSCI standards.