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SUPPLIER CODE OF CONDUCT

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1. Introduction

- 1.1 360 Law Firm Advokatpartnerselskab ("360") holds its business operations to high ethical standards.
- 360 is determined to show the community that they care by going above and beyond the bare minimum simply because it is the right thing to do. 360 strives to improve usage of sustainable solutions and act ethically, whether it be directly and through our supply chain.
- 1.3 360 aims to solely engage suppliers that share 360's way of thinking and 360's commitment to the community. Therefore, suppliers should uphold the highest standards in ethical business practices.
- 1.4 This Code of Conducts sets out the principles and expectations of 360 towards suppliers who supply goods and/or services (the "Supplier"), including their representatives, employees, agents, suppliers, and subcontractors are to conduct business with 360.

2. Compliance with this Code of Conduct

- 2.1 The Supplier is obligated to ensure that all relevant persons are informed of this Code of Conduct and all representatives, directors, employees, agents, suppliers, and subcontractors etc. comply with the standards of this Code of Conduct.
- 2.2 360 expects that the Supplier carries out due diligence of its supply chains and that the Supplier requires its own suppliers to adhere to standards similar to this Code of Conduct.
- 2.3 If the Supplier identifies non-compliance, the Supplier must take the necessary measures to improve said compliance or cease business with such non-compliant third party.

3. Compliance with laws and regulations

- 3.1 360 naturally expects that the Supplier complies with all relevant legislation, regulations, directives, industry standards, and statutory requirements in the countries where the Supplier operates.
- 3.2 The Supplier must address any non-compliance that comes to the knowledge of the Supplier.

4. Human Rights

4.1 360 expects that the Supplier respects human rights, and consequently has implemented relevant policies and procedures to meet its responsibilities to respect the fundamental and internationally recognised human rights of all employees, suppliers, and their supply chains.



4.2 The Supplier must be committed to uphold the human rights of its employees and diligently treat the employees, suppliers, etc. with dignity and respect.

5. Employee relations

Forced and Child Labour

- 5.1.1 The Supplier may under no circumstances use any kind of forced, bonded, indentured labour, or involuntary prison labour and must be determined to secure that the employment of its employees is voluntary.
- 5.1.2 The practices identified by the International Labour Organization ("ILO"), includes (but is not limited to) withholding of wages, retention of identity documents, and restriction of movement.
- 5.1.3 The Supplier must have policies and measures in place that ensure that employees are neither exploited by third party labour providers, etc. nor engage in or support human trafficking.
- 5.1.4 The Supplier may under no circumstances use child labour as defined by ILO, the United Nations Convention, and/or national law, whichever is the most stringent. The Supplier is obligated to have policies and measures in place that ensure the verification of the employees' age.

5.2 <u>Compensation</u>

- 5.2.1 The Supplier must comply with all legislation, regulations, directives, industry standards, and all other relevant statutory requirements in the countries where the Supplier operates with respect to wages and benefits such as paid leave.
- 5.2.2 Wages and benefits must, at the very least, meet the legal or industry minimum standards or comply with legally binding, freely negotiated collective bargaining agreements, whichever is higher and must at least meet the minimum needs of the employees and their families.
- 5.2.3 Any disciplinary deductions from wages or benefits must not be permitted, unless authorised by applicable law or by applicable freely negotiated collective bargaining agreement.

5.3 Working Hours

5.3.1 The Supplier must comply with all working hour legislations, regulations, directives, industry standards, and all other relevant statutory requirements in the countries where the Supplier operates. Overtime must be on



- a voluntary basis, unless exceptions defined by law or applicable freely negotiated collective bargaining agreements apply.
- 5.3.2 The Supplier must ensure that no employees of the Supplier under the age of eighteen is engaged in night shifts.
- 5.4 Freedom of Association and Collective Bargaining
- 5.4.1 The Supplier must accept and respect the rights of employees to form and join trade unions and bargain collectively without interference, discrimination, or retaliation.
- 5.5 **Health and Safety**
- 5.5.1 The Supplier must provide their employees with a safe and healthy workplace in compliance with all legislation, regulations, directives, industry standards, and all other relevant statutory requirements in the countries where the Supplier operates.
- 5.5.2 All injuries and accidents occurring at work should be logged, investigated, and reported to the relevant authorities.
- 5.5.3 The Supplier must ensure that no employees under the age of eighteen of the Supplier, or in the supply chain, will be engaged in hazardous or heavy work. Additionally, the Supplier must ensure that no employees under the age of eighteen of the Supplier, or in the supply chain, solely will engage in hazardous or heavy work with the necessary personal protection equipment and the necessary instructions.

5.6 Diversity and respect

- 5.6.1 In case the Supplier conducts or engages in business in places with no rules and regulations against discrimination, prejudice, or any kind of differential treatment, 360 expects that said Supplier commits to following non-discrimination principles and operate in ways that do not, in any way, differentiate unfairly.
- 5.6.2 The Supplier must govern its workplaces with professionalism and respect for the dignity of the individuals with whom their employees interact.
- 5.6.3 In particular, the Supplier must ensure the respect for the diversity of their employees, clients and others with whom they interact, including (but not limited to) respect for differences such as gender, race, colour, age, unionisation, parenthood, disability, sexual orientation, ethnic origin and religion.



5.6.4 The Supplier must not tolerate any harassment, discrimination, violence, or other kind of disrespectful and inappropriate behaviour.

6. Environment

- 6.1 360 expects the Supplier to comply with all applicable environmental legislation, regulations, directives, industry standards, and all other relevant statutory requirements in the countries where the Supplier operates and to apply a precautionary approach when conducting business.
- The Supplier must minimise its negative impact on natural resources, optimise its resource consumption and strive to use and encourage the development and use of environmentally friendly technologies, products, and services.
- 6.3 Further, 360 expects the Supplier to set goals to implement best practice procedures that reduce the impact of the Supplier's business on the environment and to actively pursue these targets.

7. Criminal Conduct

- 7.1 When providing goods or services to 360, or to others on 360's behalf, the Supplier must not aid, assist, or enable any person to commit a criminal act. This includes (but is not limited to) fraud and tax crimes etc.
- 7.2 360 expects the Supplier to have and maintain the necessary policies and measures to prevent crime.

8. Intellectual Property

8.1 The Supplier must respect 360's and other parties' intellectual property. Accordingly, the Supplier must take the necessary steps to safeguard and maintain confidential and proprietary information or trade secrets of its business partners and use such information only for authorised purposes.

9. Anti-bribery, corruption and money laundering

- 9.1 The Supplier may not, directly, or indirectly, engage in any act of corruption, extortion, embezzlement, money laundering or bribery. This includes (but is not limited to) accepting, receiving, offering, or giving monetary or any other incentive such as bribes that may be deemed improper, unreasonable business entertaining, gifts, or kickbacks.
- 9.2 The Supplier must have reasonable policies in place in relation to antibribery and anti-corruption.

10. Inside Information

10.1 The Supplier must have policies and procedures in place for the proper handling of inside information regarding 360 or a client of 360.



11. Competition

11.1 The Supplier may not propose or conclude agreements with another supplier or potential supplier of 360 to fix prices, terms and conditions, costs, profit margins or similar or in any other way infringe the principle of free competition.

12. Reporting mechanism

12.1 360 expects the Supplier to incorporate a process for its employees to raise the Supplier's awareness of any non-compliance with this Code of Conduct without fear of retaliation.

13. 360's monitoring

13.1 The Supplier must answer any inquiries from 360 regarding matters covered by this Code of Conduct and accept and support any audit 360 wishes to carry out for any specific risk area.

14. Future updates to this Code of Conduct

14.1 The Supplier must adhere to the principles set forth in this Code of Conduct, as updated by 360 from time-to-time.