



April 24<sup>th</sup>, 2019

## Vald. Birn Group Code of Conduct

### General principles

*Vald. Birn Group* shall

- comply with the laws and regulations of each country in which it operates.
- demonstrate and promote its commitment to responsible business practice in policies, decisions and activities.
- integrate the principles of this policy into critical processes.

### Requirements on business partners

*Vald. Birn Group* prefers to work with suppliers, consultants, distributors and other business partners that share the principles expressed in this Code of Conduct.

*Vald. Birn Group* encourages its business partners to apply standards of business conduct consistent with the principles of this Code of Conduct.

*Vald. Birn Group* shall secure that TS customers CSR demands, are known and implemented in the supplychain.

### Business principles

#### Accounting and reporting

All financial transactions shall be reported in accordance with generally accepted accounting practices and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

*Vald. Birn Group* shall report in a transparent, truthful and timely manner with the aim of conveying a true view of *Vald. Birn Group's* performance.

#### Anti-corruption

*Vald. Birn Group* shall not participate in or endorse any corrupt practices.

---

#### Vald. Birn A/S

Frøjkvej 75  
7500 Holstebro  
Denmark

#### Phone

+45 99 10 20 30

#### Fax

+45 99 10 20 40

#### Mail

mail@birn.dk

#### Web

birn.com

#### Bank

Vestjyskbank A/S  
Holstebro

#### VAT no.

26 68 11 11

#### Certificates

ISO/TS 16949  
ISO 14001  
OHSAS 18001  
ISO 50001



Representatives of *Vald. Birn Group* must not offer customers, potential customers, suppliers, consultants, governments or any representatives of such entities, any rewards or benefits in violation of applicable laws or established business practices stricter than applicable laws, to obtain or retain business or to gain any other improper advantage.

*Vald. Birn Group* employees shall not accept payments, gifts or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in their business decisions. Gifts in connection with birthdays and Christmas can be accepted if the value is below 150 Euro/piece. The board of management must be informed if the value is above 150 Euro/piece.

### **Money laundering**

*Vald. Birn Group* shall not accept, facilitate or support money laundering.

### **Conflict of interest**

All representatives of *Vald. Birn Group* must conduct their private and other external activities and financial interest in a manner that does not conflict or appear to conflict with the interest of *Vald. Birn Group*.

Employees private interests must not influence, or appear to influence, their judgement or actions in performing their duties as representatives of *Vald. Birn Group*.

### **Ethics escalation**

If an employee observe a member of the *Vald. Birn Group* that have a behavior that is not in line with the Groups policies, or our TS customers CSR demand, the employee is obliged to report the incident to his/her manager. A reported incident will not have any negative influence on the employment in the *Vald. Birn Group*.

### **Company property and resources**

*Vald. Birn Group's* property and resources shall be used only for business objectives.

The property and resources must not be used for personal gain, fraudulent purposes, or in any other inappropriate manner.

### **Taxation**

*Vald. Birn Group* shall comply with the tax laws and regulations of each country in which it operates. Where tax laws do not give clear guidance, prudence and transparency must be the guiding principles.

### **Customer offering**

*Vald. Birn Group* must ensure that its products meet all applicable regulatory requirements.

### **Marketing and sales**

*Vald. Birn Group* must present its products and services accurately and shall comply with applicable regulatory and legal requirements.

---

#### **Vald. Birn A/S**

Frøjkvej 75  
7500 Holstebro  
Denmark

#### **Phone**

+45 99 10 20 30

#### **Fax**

+45 99 10 20 40

#### **Mail**

mail@birn.dk

#### **Web**

birn.com

#### **Bank**

Vestjyskbank A/S  
Holstebro

#### **VAT no.**

26 68 11 11

#### **Certificates**

ISO/TS 16949  
ISO 14001  
OHSAS 18001  
ISO 50001



*Vald. Birn Group* shall not make false statements or provide misleading information regarding its products or their performance.

#### **Fair competition practices**

*Vald. Birn Group* shall compete in a fair manner and with integrity.

*Vald. Birn Group* shall not exchange information, enter agreements or understandings with competitors, customers or suppliers in a way that improperly influences the market place or the outcome of a bidding process.

*Vald. Birn Group* must use legitimate methods to gather information about our competitors.

---

#### **Vald. Birn A/S**

Frøjkvej 75  
7500 Holstebro  
Denmark

#### **Phone**

+45 99 10 20 30

#### **Fax**

+45 99 10 20 40

#### **Mail**

mail@birn.dk

#### **Web**

birn.com

#### **Bank**

Vestjyskbank A/S  
Holstebro

#### **VAT no.**

26 68 11 11

#### **Certificates**

ISO/TS 16949  
ISO 14001  
OHSAS 18001  
ISO 50001



## Principles of human rights and social justice

### Human rights

*Vald. Birn Group* shall support and respect the protection of internationally proclaimed human rights and make sure that the company is not complicit in human rights abuses.

### Non-discrimination

All employees shall have equal opportunities based on competencies, experience and performance regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background or ethnic origin.

All employees must be treated with respect. Discrimination, physical or verbal harassment, or any illegal threats are not tolerated.

### Workplace practice

The necessary conditions for a safe and healthy work environment shall be provided for all employees at *Vald. Birn Group*.

### Forced labor

*Vald. Birn Group* shall not engage in or support forced, bonded or compulsory labour.

Employees are free to leave their employment after reasonable notice as required by law and contract.

### Child labour

Child labour is not tolerated. The minimum employment age is the age of completion of compulsory school but never less than 15 years.

### Freedom of association

*Vald. Birn Group* respects the right of all employees to join an association to represent their interests as employees, to organize and to bargain collectively or individually. *Vald. Birn Group* shall respect the recognized unions. An employee's right to refrain from joining a union is equally respected.

### Working hours and compensation

*Vald. Birn Group* shall comply with applicable laws, agreements and industry standards on working hours and compensation.

### Environmental principles

### Resource efficiency

The products and processes of *Vald. Birn Group* must be designed in such a way that energy, natural resources and raw materials are used efficient and waste and residual products are minimized.

---

#### Vald. Birn A/S

Frøjkvej 75  
7500 Holstebro  
Denmark

#### Phone

+45 99 10 20 30

#### Fax

+45 99 10 20 40

#### Mail

mail@birn.dk

#### Web

birn.com

#### Bank

Vestjyskbank A/S  
Holstebro

#### VAT no.

26 68 11 11

#### Certificates

ISO/TS 16949  
ISO 14001  
OHSAS 18001  
ISO 50001



### **Precautionary principle**

*Vald. Birn Group* shall avoid materials and methods posing environmental and health risks when suitable alternatives are available.

***This Code of Conduct has been adopted by the Board of Directors 2018-01-01***

---

#### **Vald. Birn A/S**

Frøjkvej 75  
7500 Holstebro  
Denmark

#### **Phone**

+45 99 10 20 30

#### **Fax**

+45 99 10 20 40

#### **Mail**

mail@birn.dk

#### **Web**

birn.com

#### **Bank**

Vestjyskbank A/S  
Holstebro

#### **VAT no.**

26 68 11 11

#### **Certificates**

ISO/TS 16949  
ISO 14001  
OHSAS 18001  
ISO 50001