



# Supplier Code of Conduct

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# 1. Purpose and scope

SOS International is committed to economic, environmental and social sustainable development. This forms the basis of our approach to sustainability and our way of conducting our business in line with ethical principles as described in SOS International's Code of Conduct. We also expect our suppliers and business partners to demonstrate the same commitment to sustainable and ethical business practices.

The Supplier Code of Conduct (the "Code") is based on the principles in SOS International's Code of Conduct and is also inspired by the ten principles of the UN Global Compact. The Ten Principles of the UN Global Compact are based on four key international frameworks:

- **The Universal Declaration of Human Rights**
- **The International Labour Organization's Declaration on Fundamental Principles and Rights at Work**
- **The Rio Declaration on Environment and Development**
- **The United Nations Convention Against Corruption**

These documents form the foundation of the UN Global Compact's principles on human rights, labour, environment, and anti-corruption.

The Code applies to all suppliers of SOS International A/S and its subsidiaries. It represents the minimum requirements we expect our suppliers to meet in relation to human rights, environmental matters, and business ethics.

We expect our suppliers to comply with the Code. In addition, our suppliers must ensure that their suppliers also comply with this Code or similar provisions based on the same principles as laid down in this Code.

In addition to complying with this Code, our suppliers must comply with all applicable laws and regulations in the jurisdictions where they operate. Where this Code and applicable laws or regulations differ, suppliers are required to follow the stricter standard.

## 2. Human rights, including labour rights

Our suppliers are expected to create a working environment that respects human rights, while ensuring fair and ethical conditions for all their employees, regardless of their background.

### Human rights, wages and working conditions

- In alignment with the UN Universal Declaration of Human Rights and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, respect every employee's human and labour rights.
- Comply with applicable laws and regulations, collective bargaining agreements and industry standards on wages and working hours, supporting that the employees have a decent living standard.
- Respect the rules for the employees' overtime work and resting periods between working hours and personal life and offer breaks and paid leave.

### Freedom of association

- Respect the employees' lawful freedom of association and their right to bargain collectively with their employer.

- Refrain from discriminating or retaliating against the employees when exercising their right to association, union membership, or collective bargaining activities.

### Child-labour, trafficking in human beings, forced or compulsory labour

- Prohibit the employment of children under the minimum working age as defined by applicable laws and regulations.
- Condemn the use of forced labour and exploitative child labour. Ensure that work is undertaken freely and without threat or force.
- Prevent modern slavery and human trafficking in any form.

### Diversity, equity and inclusion

- Provide equal opportunity for all employees and do not discriminate on the basis of race, colour, sex, gender identity, age, religion, beliefs, nationality, ethnic or social origin, disability, sexual orientation, political view, or any other legally protected characteristic at any level of the organisation.
- Ensure fair and unbiased practices in recruitment, training, and compensation, embracing a diverse and inclusive workplace.
- Prevent harassment and bullying in the workplace, and provide employees with safe, accessible reporting channels for reporting unethical behaviour and other serious wrongdoings.

### Employee health and safety

- Provide a safe and healthy work environment for all employees, including temporary workers, consultants, service personnel and visitors.
- Conduct all the necessary training with regards to safety and potential hazards for all employees and their respective type of employment.
- Identify any potential emergency situations with the workplace and plan properly the response to these emergencies (e.g. fire, flooding, power cut, etc.).

## 3. Environmental matters

We expect our suppliers to work proactively to minimise negative environmental impact and to contribute positively to the global environmental and climate ambitions, according to their size and operations.

### Environmental compliance

- Ensure compliance with applicable environmental laws and regulations, considering the environmental impacts of activities, products and services.
- Establish relevant environmental objectives and targets, significant environmental affairs and develop action plans to achieve the stated objectives and targets.
- Always strive to go beyond environmental compliance and encourage own suppliers to consider the same.

### Responsible environmental management

- Identify activities, products and services that have or may have a significant impact on the environment throughout the entire value chain.
- According to the identified environmental impact, strive for improvement on management of waste reduction, pollution, water and resource efficiency and show consideration for biodiversity protection.
- Ensure that any person performing tasks which have the potential to cause significant environmental impact is competent and has the proper education, training and experience to overcome the potential risk.

### Climate action

- Actively work with reducing greenhouse gas emissions and have procedures in place to effectively monitor performance.

- Consider setting greenhouse gas emission reduction targets, ideally in accordance with internationally recognised standards.
- For small suppliers, be mindful of the carbon footprint and the impact on the climate and consider more sustainable solutions to the operations.
- Support and engage with own suppliers, as needed, to contribute to greenhouse gas emission reductions.
- Always seek to source renewable energy relevant to your size and operations.

## 4. Business ethics

Our suppliers are expected to adopt fair and respectful business practices towards all business relations and to respect and comply with all applicable laws and regulations.

### Anti-corruption, financial crime, anti-bribery and use of substances

- Comply with applicable laws and regulations relating to anti-corruption and financial crime and refrain from engaging in any form of bribery or extortion.
- Abstain from deliberate or inadvertent involvement in money laundering.
- Refrain from offering disproportionate donations or funding, excessive gifts, extravagant entertainment or similar improper advantages to representatives of business partners, government officials, etc. Courtesies must be properly reflected as such in the books and records.
- Refrain from offering, promising or making facilitation payments.
- Provide and record all business information honestly and accurately, including expenses, revenues, data and any other corporate information.
- Refrain from using illegal drugs, abuse alcohol or misuse legal drugs when conducting business.

### Protection of personal data, information security and confidentiality

- Respect and protect the individual's right to privacy by adhering to applicable laws and regulations regarding processing of personal data, including sensitive data.
- Respect the principles of lawful, fair and transparent data processing, as well as the principles of purpose limitation and data minimisation.
- Ensure confidential and secure data processing and make sure to implement appropriate technical and organisational security measures to protect data, including personal data.
- Make sure to handle business relevant information confidential and take all reasonable precautions to ensure that confidential information is not disclosed to any third party without a legal basis.

### Conflict of interest

- Avoid conflict of interests and always make decisions without regard to personal concerns that could impair, or be perceived to impair, business judgment.
- Disclose conflict of interests if they occur.

### Fair competition

- Engage in fair competition and ensure compliance with applicable competition and anti-trust laws and regulations.
- Abstain from fixing prices, dividing markets or otherwise restraining free trade.

### Sanctions

- Adhere to national and international sanction rules relevant to individuals, companies or countries and the respective transaction of goods and services.
- Do not engage in trade with individuals or companies that are subject to sanctions, or otherwise restricted due to the country they operate in.
- Only select suppliers that comply with national and international sanction rules.

## 5. Collaboration

SOS International wishes to foster a collaborative mindset with our suppliers. It is important that our suppliers understand and respect this Code.

### Proof of compliance

- SOS International reserves the right to conduct inspections and audits to verify compliance with this Code, as well as applicable laws and regulations and relevant industry standards. This also applies to any financial transactions carried out on our behalf by the supplier or its own suppliers.
- On request, suppliers should provide the necessary information and documentation in order to demonstrate compliance with this Code. Such information may be disclosed to SOS International's customers, if relevant.

### Engagement with own supply chain

- Promote and ensure compliance with this Code by your own suppliers
- Engage with own suppliers to help achieve environmental and human and labour right ambitions in the supply chain.
- Collaborate and follow up with low performing suppliers, also considering their size and operations.

### Report concerns

- Be proactive, and report concerns of non-compliance or any other misconduct to your contact person at SOS International or through our whistleblowing scheme accessible via our website that ensures strict confidentiality.

### Non-compliance

In case of failure to comply with this Code, SOS International may request the supplier to prepare a plan stating how to address the situation and implement actions to improve and ensure progress. Termination of the contract with the supplier can be expected in the event of repeated or serious breaches of this Code. Therefore, SOS International requests:

- Make sure that you are familiar with this Code and understand and accept to follow the requirements outlined in it.
- Contact SOS International if you are unable to comply with this Code, in order to receive guidance and a structured approach to meeting the requirements.

## 6. Contact information

Questions and observations relating to this Code can be directed to SOS International at:

SOS International  
Group Sustainability  
Arne Jacobsens Allé 7  
2300 Copenhagen S, Denmark  
Email: [groupsustainability@sos.eu](mailto:groupsustainability@sos.eu)