

Borregaard, a member of the United Nations Global Compact, aims to conduct responsible, ethical and health-conscious activities in all areas, where we set high standards for ourselves and our impact on the environment and society around us.

To ensure safe working conditions throughout Borregaard's supply chain, ensuring that workers are treated with respect and dignity, that business operations are environmentally sound, and that business is conducted in accordance with internationally recognized principles for business ethics, we expect our suppliers to follow the same principles.

This Supplier Code of Conduct (SCoC) describes minimum requirements. Where provision of law and this SCoC addresses the same subject, the highest standard applies.

SUPPLIER CODE OF CONDUCT DECLARATION

As a supplier to Borregaard we will comply with all applicable laws and regulations. We will comply with the requirements stated in this SCoC, the Ten Principles of the UN Global Compact and the standards given by the International Labour Organization (ILO).

THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT

Detailed description of each principle is given in www.unglobalcompact.org/aboutthegc/thetenprinciples

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

THE STANDARDS GIVEN BY THE INTERNATIONAL LABOUR ORGANIZATION

Reference: [The text of the Declaration and its follow-up \(DECLARATION\) \(ilo.org\)](#)

Labour

1. Employment is freely chosen. We shall not use or benefit from any form of forced, bonded, or indentured labour.
2. Freedom of association and the right for collective bargaining are respected. We shall respect the right of workers to associate freely with, form, and join or not join trade unions or similar external representative organizations, and bargain collectively, in accordance with applicable laws and regulations.
3. Working conditions are safe and hygienic. We shall provide a healthy, hygienic, and safe working environment for all our workers in accordance with applicable laws and regulations. We shall take adequate measures to prevent accidents, injury, or work-caused illness.
4. Wages shall as a minimum comply with national legal standards or industry benchmark standards, whichever is greater. Wages shall ensure an adequate standard of living. Regular employment is provided wherever possible. As stated in the ILO conventions, all workers shall be provided with a written and comprehensible contract of employment in a language they understand outlining their wage conditions and method of payments before entering employment. Deductions from wages as a disciplinary measure shall not be permitted.
5. We shall ensure that working hours are not excessive and not endanger the employee's health and safety with applicable national laws and the ILO conventions.

Workers shall be granted annual leave and sick leave, to which they are entitled according to national legislation, without any form of negative sanctions. In case of pregnancy, female workers shall be given maternity leave in accordance with the national legislation.

Working hours and breaks shall comply with national laws and industry standards, whichever affords greater protection. It is recommended that working hours do not exceed 48 hours per week. Workers shall be provided with at least one day off for every 7-day period.

Overtime shall be voluntary and limited. 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. Workers shall receive overtime pay. The pay shall, as a minimum, be in accordance with relevant legislation (ILO Convention No. 1 and 14).

Human rights

6. Child labour shall not be used. The minimum age for any person employed shall comply with internationally recognized standards such as the guidelines of UNICEF, and the ILO conventions, as well as national laws.
7. All workers shall be treated fairly and with respect. We shall not tolerate any forms of discrimination or harassment including, but not limited to age, religion, sex, sexual orientation, political opinion, ethnicity, or disability.
8. We must ensure that no workers are subject to physical, sexual, or psychological harassment or other abusive, threatening, or inhumane behaviour. We shall provide workers access to grievance mechanisms.
9. Workers shall receive relevant and documented health and safety training, and such training shall be repeated on a regular basis.

10. Own production shall not harm marginalized populations or their ability to access and use land and natural resources necessary for their existence.

Anti-corruption

11. Bribery, corruption, and fraud, or attempts thereof, is prohibited
12. Improper benefits or favours offered to any public official or any other third party is unacceptable
13. We understand that in general gifts and hospitality to Borregaard representatives shall be avoided. Courtesy gifts should be of insignificant value. Hospitality may be offered if there is a legitimate business purpose involved, and the cost is kept at a reasonable level
14. We respect that travel expenses for the individual representing Borregaard shall be paid for by Borregaard.
15. Hospitality or gifts shall not be offered or received in situations of bidding or negotiations.
16. We shall comply with competition regulations, and not be involved in illegal price cooperation or market sharing.
17. Borregaard will do its utmost to avoid buying from countries, industries, or companies where there is a broad international agreement to boycott. We will implement a similar policy.

Environment

18. Environmental impact shall be considered throughout the value chain. We work according to internationally recognized environmental management principles and establish a plan for reduction of environmental impacts, as well as follow-up and document the work.
19. We shall work to achieve energy and water efficiency and minimize harmful discharge, emissions, and waste production in a lifecycle perspective. We shall characterize and treat wastewater and solid waste appropriately, in accordance with applicable laws and regulations. Air emissions shall be monitored and treated in accordance with applicable permits and emission limits.
20. We shall identify hazardous materials, chemicals, and substances, and ensure their safe handling, storage, use, movement, recycling or reuse, and disposal.
21. We shall consider the environmental credentials and performance of vendors within our supply chain and require them to operate to a minimum set of standards where applicable.



As a supplier to Borregaard we will be open and transparent and enter freely into dialog about potential challenges in meeting the requirements in the SCoC.

If we become aware of or have suspicion about any misconduct of Borregaard's SCoC or laws and regulations, we shall inform our procurement point of contact in Borregaard.

We confirm that if non-compliances are revealed, either through internal audits, grievance mechanisms or external audits appropriate corrective actions will be taken. We are aware that Borregaard considers compliance and willingness to implement corrective actions, when necessary, when selecting suppliers and placing orders. Further, that business can be ended consequently to persistent non-compliance with Borregaard's SCoC or a lack of willingness to cooperate around corrective actions.

We are familiar with Borregaard's whistleblowing channel, a grievance mechanism where any whistleblowing will be treated strictly confidential¹, which can be found at borregaard.com and we will communicate its existence amongst relevant personnel.

We agree to communicate the same expectations and requirements described in this SCoC to our own suppliers and business relationships.



The Authorised signature below is from a representative with authority to act on behalf of our company.

Supplier name: _____
Address: _____
Date: _____
Printed name: _____
Authorised signature: _____

¹ Link to new external whistle-blower channel will be establish in Q1 2022. In the meantime, whistle-blowers may use compliance@borregaard.com. All information will be treated strictly confidential.