SUPPLIER CODE OF CONDUCT

Introduction

Pro-Automatic A/S' mission is to create flexible and future-proof electrical switchboards of all sizes and for all industries, ranging from small, series-produced distribution boards to complex control and power distribution switchboards. In an increasingly electrified world, where demand for electricity is growing as part of the green transition, Pro-Automatic aims, as a supplier to the green transition, to provide switchboards that make a positive contribution to this transition.

Pro-Automatic provides some of the market's most innovative products, meeting the highest standards of quality. In addition, we provide our customers with comprehensive documentation, a high level of service, and professional expertise from our specialists throughout the entire process. We actively engage in technological development at an international level and employ some of the industry's leading specialists. We continuously strive to strengthen our production through the implementation of the latest technologies. This enables us to deliver some of the market's leading solutions within switchboard manufacturing.

Pro-Automatic places great importance on building strong relationships of trust with our customers and business partners. We therefore place a high value on keeping our commitments and always seek to establish close cooperation with each customer, allowing ideas to be exchanged and challenges to be resolved through open and constructive dialogue.

What We Expect from Our Suppliers

In short: We expect integrity and responsible business conduct. This means that all our suppliers are expected to act diligently, follow the rules, and treat people, data, and the environment with respect. We manufacture electrical switchboards and control solutions for customers throughout Denmark and, through our customers, for the Nordic countries, Europe, and other parts of the world. We promise our customers quality, documentation, and a high level of professional expertise. We can only fulfil that promise together with suppliers who share these values.

We recognise that our suppliers are businesses with different cultures, structures, and resources, and therefore have different capabilities when it comes to complying with this Code of Conduct. We do not expect our suppliers to devote disproportionate resources to complying with our Code of Conduct. We do, however, expect suppliers to make their best efforts to comply with it. Integrity and responsible business conduct are a natural part of a good business relationship.

If there are one or more requirements that a supplier is unable to meet, the supplier must inform us accordingly.

We have zero tolerance for suppliers who deliberately or grossly mislead us. Such conduct may result in termination of the business relationship.

If we identify a breach of our Code of Conduct that has not been communicated to us, we expect the supplier to remedy the situation. In the event of repeated or serious breaches, the supplier must expect that we may terminate the business relationship without notice and without the supplier being entitled to claim compensation of any kind.

PURPOSE

This Code of Conduct applies to **all** suppliers providing goods, components, software, services, or labour to Pro-Automatic. Suppliers shall, to the extent reasonably possible, impose corresponding requirements on their own suppliers and subcontractors. Ultimately, responsible business conduct must extend throughout the entire value chain.

At Pro-Automatic A/S, we are committed to respecting internationally recognised human rights and acting responsibly towards the local communities in which we operate. This commitment is anchored at the highest level of our organisation and reflected in our policies, including this Code of Conduct.

GUIDING PRINCIPLES

We expect our suppliers to conduct their business in accordance with the following internationally recognised principles and frameworks, which we consider important elements of responsible business conduct:

- **The UN Global Compact** and its 10 principles on human rights, labour, the environment, and anti-corruption.
- **The UN Guiding Principles on Business and Human Rights (UNGPs)**, in particular the corporate responsibility to respect human rights.
- **The International Bill of Human Rights** (UDHR, ICCPR, and ICESCR).
- **The Children's Rights and Business Principles** (UNICEF/UNGC/Save the Children).
- **The ILO Declaration on Fundamental Principles and Rights at Work** (1998, amended in 2022, including recognition of a safe and healthy working environment as a fundamental principle and right at work).
- **The ten ILO Fundamental Conventions**, covering freedom of association and collective bargaining, the elimination of forced and child labour, non-discrimination and equal remuneration, and occupational safety and health.
- **The UN Sustainable Development Goals (SDGs)**, in particular SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry, Innovation and Infrastructure), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action)

Why? Because both we and our customers expect quality and responsibility, and because integrity is not merely a desirable quality but the foundation of a strong and sustainable business.

RESPONSIBILITY

Pro-Automatic actively seeks to have a positive impact on society and people. We can only achieve this if our suppliers demonstrate the same level of responsibility and comply with the following requirements:

Labour

- Maintain high standards for all working conditions. Wages, working hours, breaks, and benefits must, as a minimum, comply with applicable legislation and relevant collective agreements. Ensure equal opportunities and avoid all forms of discrimination in recruitment and employment.
- Maintain zero tolerance for forced labour, bonded labour, and child labour, and ensure that business activities do not cause harm to children, either directly through employment or indirectly through subcontractors or impacts on local communities.
- Respect freedom of association and the right to collective bargaining.
- Treat migrant and temporary workers fairly and lawfully. Responsible business conduct applies to everyone.

Diversity, Respect and Non-Discrimination

- Refrain from all forms of discrimination based on gender, age, ethnicity, religion, sexual orientation, disability, political opinion, or similar grounds. Maintain zero tolerance for harassment, abuse, and bullying.
- Promote a healthy and positive working environment based on mutual respect and appropriate conduct, where people feel safe to speak up and set boundaries. This is responsible business conduct in practice and contributes to employee well-being.

Health and Safety

- A safe and healthy working environment is a fundamental requirement. Identify and assess risks, take preventive measures, provide appropriate personal protective equipment, instructions and training, and learn from near misses and accidents.
- Respect the ILO's fundamental principles and rights at work, which since 2022 include the right to a safe and healthy working environment.
- Comply with applicable local rules when working at or visiting Pro-Automatic or our customers. Responsible business conduct means taking care of people, every day.

Business Ethics and Anti-Corruption

- Maintain zero tolerance for bribery, kickbacks, facilitation payments, corruption, and conflicts of interest.
- Gifts and hospitality must never improperly influence business decisions.

- Immediately report suspected misconduct or irregularities. This is also consistent with Principle 10 of the UN Global Compact on anti-corruption.

Cybersecurity and Data Ethics

- Protect your own and Pro-Automatic's information, personal data, and other data through appropriate technical and organisational measures and always in accordance with applicable legislation and recognised best practices.
- Apply the principles of **need to know** and **least privilege**, including appropriate access controls, logging, updates and patching, and effective malware protection.
- Ensure secure data sharing. Encrypt data during transmission and storage, avoid insecure channels, and use only approved tools and software.
- Security incidents, such as data breaches, ransomware, or compromised accounts, must be reported to Pro-Automatic **without undue delay and in any event within 24 hours of becoming aware of the incident**, together with clear information regarding the status, impact, and remediation measures.
- Take a systematic and responsible approach to data ethics and respect customer and employee information. Data must be treated as a responsibility, not merely as a resource.
- AI systems must be used responsibly and in accordance with applicable legislation. Suppliers should ensure that AI is not used in a manner that infringes human rights, results in discrimination, or compromises data security.
- Responsible business conduct also applies online. Act professionally, prevent misuse of IT systems, and protect both your organisation and Pro-Automatic against digital risks.

Traceability and Conflict Minerals

- Seek to ensure traceability of critical raw materials and components and comply with applicable requirements relating to conflict minerals, sanctions, and export controls.
- Pro-Automatic must be informed if a product contains 3TG minerals/metals.
- Provide information regarding origin upon request. Transparency is an important element of responsible business conduct.

QUALITY AND DOCUMENTATION

Pro-Automatic provides solutions and products that meet the highest standards of quality. We also provide our customers with comprehensive documentation. We can only fulfil these commitments if our suppliers comply with the following requirements:

- Supply products and services that, as a minimum, comply with applicable legislation and relevant standards.
- Products must be supplied with complete and accurate documentation, including material and component data, test documentation, traceability information, certificates, etc., enabling us to meet our commitments to our customers regarding quality and documentation.

    - Work towards ensuring that supplied products can also be accompanied by EPDs and/or LCAs.
    - Where EPDs or LCAs cannot be provided, our suppliers must be able to provide information regarding the products' country of origin, weight, and material composition.
- In the event of defects or non-conformities, respond promptly, provide the root cause and an action plan, and assist with remediation or recall where necessary.
- Pursue continuous improvement and demonstrate that quality is managed systematically. Responsible business conduct also means learning and improving.

ENVIRONMENT AND CLIMATE

As a supplier supporting the green transition, and with the aim of reducing climate impact and supporting our own and our customers' ESG reporting, we expect our suppliers to:

- Comply with applicable environmental legislation, permits, and standards, and actively work to prevent pollution, conserve resources, and reduce CO_2 emissions.
- Prioritise materials and processes with a lower environmental impact, for example through energy efficiency, waste separation and recycling, and responsible chemical management.
    - Inform Pro-Automatic if a product contains substances subject to REACH requirements.
- Apply a lifecycle perspective and consider the UN Sustainable Development Goals, particularly SDG 12 on Responsible Consumption and Production and SDG 13 on Climate Action.
- Provide environmental data and improvement plans upon request. Transparency is responsible business conduct in practice

REPORTING

To ensure transparency in our business relationships and compliance with this Code of Conduct, we expect our suppliers, where reasonably possible, to maintain appropriate documentation and transparent reporting practices. Where we request documentation and/or reporting, we will naturally assist our suppliers in understanding our requests and how our requirements may be met.

Documentation and Audits

We apply a risk-based approach to monitoring compliance with this Code of Conduct. This means that we continuously assess and follow up on whether our suppliers meet its requirements.

- Suppliers must be able to demonstrate compliance with this Code of Conduct or equivalent or stricter requirements, for example through their own Supplier Code of Conduct, relevant certificates, ESG reports, or similar documentation.
- Upon request, suppliers must participate in self-assessments, audits, and follow-up activities. Transparency and cooperation are also important elements of responsible business conduct. Such measures will be implemented based on a risk assessment or where there is a reasonable suspicion of a breach of this Code of Conduct.

Where appropriate, we may request an action plan describing the measures to be implemented to address identified risks or remedy non-compliance with this Code of Conduct.

Whistleblowing and Dialogue

- We encourage open dialogue. If something appears to be wrong, please speak up, either within your own organisation or directly to us.
- Suppliers must provide a safe and confidential channel through which employees can report concerns in good faith without fear of retaliation.

It is our policy that it is better to receive one report too many than one too few, to ensure that all relevant concerns are brought to our attention.

If, as a supplier, you become aware of circumstances that may constitute a breach of this Code of Conduct, we encourage you to report the matter through our whistleblower scheme:

Submit your report here

Reports may be submitted anonymously and will be handled confidentially and professionally.

BREACHES OF THE CODE OF CONDUCT

We aim to resolve issues in close cooperation with our suppliers. However, serious matters require clear consequences in order to protect people, our customers, and our business.

- **Minor non-conformities**: An action plan and a reasonable timeframe for remediation.
- **Serious or repeated breaches**, such as child or forced labour, serious health and safety violations, corruption, or serious data breaches: Temporary suspension or termination of the business relationship without compensation to the supplier.

We prefer to resolve issues properly, constructively, and in good faith, but protecting people, our customers, and our business will always take priority.

ACCEPTANCE

As a supplier to Pro-Automatic, we hereby confirm that we accept this Code of Conduct and will actively work to comply with its requirements. We further undertake to support Pro-Automatic in promoting **integrity and responsible business conduct throughout the value chain**.

Date: /

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Company name	Name and title of signatory	Signature