



## **Code of Conduct for Suppliers of the Wilfa Group**

At the Wilfa Group, we are committed to complying with all applicable laws and regulations, to upholding human rights and labour standards and to protecting the environment – in our own operations as well as in relation to our business partners. Wilfa also supports UN declarations, core ILO conventions, the ETI base code and the principles of the United Nations Global Compact. We expect our suppliers to share this commitment. This Supplier Code of Conduct defines the basic requirements to meet our standards.

### **1. Forced and compulsory labour (ILO Conventions Nos. 29 and 105)**

1.1. There shall be no forced, bonded or involuntary prison labour.

1.2. Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

### **2. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)**

2.1. Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.

2.2 Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.

2.3 Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

### **3. Child Labour (UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146)**

3.1. The minimum age for workers shall not be less than 15 and comply with i) the national minimum age for employment, or; ii) the age of completion of compulsory education,

3.2. whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.



3.3. There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.

3.4. No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.

3.5. Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

#### **4. Discrimination (ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women)**

4.1. There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.2. Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behaviour, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.

#### **5. Harsh or Inhumane Treatment (UN Covenant on Civil and Political Rights, Art. 7)**

5.1. Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

#### **6. Health and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)**

6.1. The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

6.2. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

6.3. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.



6.4. Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.

### **7. Wages (ILO Convention No. 131)**

7.1. Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.

7.2. All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

7.3. Deductions from wages as a disciplinary measure shall not be permitted.

### **8. Working Hours (ILO Convention No. 1 and 14)**

8.1. Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards. Weekly working hours should not on a regular basis be more than 48 hours.

8.2. Workers shall be provided with at least one day off for every 7 day period

8.3. Overtime shall be limited and voluntary. 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.

8.4. Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), minimum in accordance with relevant legislation.

### **9. Regular Employment (ILO Convention No. 95, 158, 175, 177 and 181)**

9.1. Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short term contracting (such as contract labour, casual labour or day labour), sub-contractors or other labour relationships.

9.2. All workers are entitled to a contract of employment in a language they understand.

9.3. The duration and content of apprenticeship programmes shall be clearly defined.

### **10. Marginalized Populations (UN Covenant on Civil and Political Rights, art. 1 and 2)**



10.1. Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

## **11. Environment**

11.1. Negative impact on the environment shall be reduced throughout the value chain. In line with the precautionary principle, measures shall be taken to continuously minimize greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity.

11.2. National and international environmental legislation and regulations shall be respected and relevant discharge permits obtained.

11.3. Commit to continuous improvements of environmental protection.

11.4. Use or set up a reasonable environmental management system.

## **12. Corruption**

12.1. Comply with all applicable laws and regulations, in particular:

12. Prohibition of corruption and bribery: Do not engage in or tolerate any form of corruption or bribery, in particular any payment, “kickback” or other form of benefit conferred for the purpose of influencing decision making.
13. Competition and antitrust: Conduct business in compliance with all applicable competition/antitrust laws and regulations.
14. Conflict of interest: Avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in business dealings with Wilfa or third parties.
15. Confidentiality: Keep Wilfa’s business, financial and technical data as well as business correspondence confidential; do not misappropriate Wilfa’s or other companies’ tangible or intellectual property.



### **13. Animal welfare**

13.1 Animal welfare shall be respected. Measures should be taken to minimize any negative impact on the welfare of livestock and working animals.

13.2 National and international animal welfare legislation and regulations shall be respected.

### **14. Supply chain**

Undertake reasonable efforts to encourage your own suppliers and sub-contractors to comply with the principles of this Supplier Code of Conduct.

#### **Compliance with this Code of Conduct – Improvements**

##### ◆ Auditing and Monitoring

In order to evaluate compliance with this CoC, Wilfa may conduct on-site audit of suppliers and their production sites. We reserve the right to monitor compliance with this CoC by inspections, conducted by assessment evaluations of their own business based on this CoC.

##### ◆ Non-compliance – Corrective actions – Termination of the contract

This CoC sets the standard expected to be met by all our suppliers throughout the value chain. If the requirements in this CoC are not met by a supplier, the parties will discuss corrective actions through an open dialogue. The supplier shall do its utmost to implement corrective actions as soon as possible, and it shall inform Wilfa about any such actions.

##### ◆ Evaluation and Improvement

Wilfa expects that the suppliers continuously and systematically evaluate their compliance with this CoC. We furthermore expect that improvement measures, whenever needed, are implemented by the suppliers. Wilfa will also continuously evaluate and, if needed, improve our own policies and purchasing practices in order to facilitate the suppliers' and their sub-suppliers' compliance with this CoC.