

CODE OF CONDUCT

CPC – CENTER FOR PRODUCT CUSTOMIZATION APS

26. May 2021 Edition

INTRODUCTION AND MOTIVATION

- Respect for and compliance with the law is an undisputed priority of CPC
- CPC complies with the various legal and regulatory frameworks that apply in the jurisdictions where we operate
- This behavior is the basis from which CPC can protect its integrity and reputation.

PURPOSE

- The Code of Conduct is a collection of rules and policy statements intended to assist employees in their daily decision making. It sets forth guidelines for how to behave in relation to customers, suppliers, the authorities and other stakeholders.
- The Code of Conduct applies to all employees in CPC, and it is important that every employee understands and complies with the Code of Conduct.
- CPC ensures that every employee is familiar with the Code of Conduct and adhere to it
- CPC ensures that suppliers involved in Customer projects also is familiar with CPCs Code of Conduct.

VIOLATION

- Failure to comply with the Code of Conduct may expose employees and CPC to reputational damage as well as to legal and regulatory sanctions.
- Disciplinary proceedings in case of severe compliance misconduct may result in a reprimand, fine or dismissal.

HUMAN RIGHTS

- CPC adheres to all relevant laws and regulations aimed at the protection and promotion of human rights globally and at work.
- CPC sees its employees as its greatest asset. Each employee is valuable and together they form the foundation for the CPC's success.
- It is important that employees treat everyone with dignity and respect. CPC does not accept discrimination based upon ethnic background, gender, religion, age or sexual orientation. Discriminatory behavior or harassment of any kind is not tolerated.
- We inform our employees about the importance of human rights, respect their right to freedom of association, and recognize the right to be member of a union.

CHILD LABOR

- CPC supports all efforts to eliminate child labor in the long term. In the meantime, we will ensure that the UN Convention on the Rights of the Child is respected in all activities, we take part in.
- CPC requires a minimum age of 15 years for employees, and children aged 15-18 can never do strenuous or potentially hazardous work tasks. Moreover, children aged 15-18 must always be supervised and supported with training and frequent dialogues with their superiors. The best interest of the child is always a priority.

ANTI-BRIBERY, CORRUPTION AND FRAUD

- CPC condemns corruption in all its forms and does not tolerate it in its business or with its business partners.
- If employees are involved in bribery or corruption, they may find themselves personally criminally liable and subject to disciplinary action.

The three following principles apply:

1. CPC and its employees do not accept or solicit bribes in any form.
 2. CPC does not make, and will not accept, facilitation payments or kickbacks of any kind.
 3. CPC's employees do not give or receive gifts above token value apart from gifts given or received in specific situations.
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- The line between right and wrong can sometimes be difficult to draw because of variations in local culture, customs and habits. If in doubt, employees should refer their concerns to their manager.
 - CPC does not tolerate any form of fraud, including theft, embezzlement, money laundering or misuse of the company's property.

GIFT AND ENTERTAINMENT

- From time to time in the normal course of business relations, gifts (including entertainment) are offered, given and received.
- All employees must exercise great care with respect to gifts to and from customers, suppliers or others with whom they come into professional contact.

DEALING WITH CONFIDENTIAL INFORMATION

- All employees have a legal duty to safeguard confidential information, regardless of whether it is obtained from customers, associates, suppliers or sources within CPC.
- Confidential information must not be disclosed to third parties without the owner's consent.

RELATIONS

With customers

- The aim is to ensure that customers trust the CPC and experience value-creating relations.
- All communications through all channels to all target groups should be open, truthful and unambiguous.

With suppliers

- CPC wants to help promote social and environmental improvements at our suppliers.
- CPC expects that our suppliers comply with national laws and internationally recognized standards and conventions for ethical, environmental and social conditions.

MANAGING COMPLAINTS

- CPC will deal with complaints from customers or former customers promptly and fairly and in accordance with applicable laws and regulations.
- CPC has developed procedures to support this process.