



---

## 1. CODE OF CONDUCT FOR SUBCONTRACTORS AND SUPPLIERS

### 1. Introduction

To fulfil both the Code of Conduct and the overall CSR policy of Femern A/S (the Owner), it is necessary to express a Femern Link Contractors (FLC) Code of Conduct to all subcontractors and suppliers (Supplier). FLC's Management acknowledges the Owners objective to ensure high ethical and professional standards throughout the execution of the entire Femern Fixed Link project, and in that sense that all parties involved, contractors, consultants and suppliers, shall act responsibly when dealing with climate, environmental, social and economic demands and standards.

### 2. Purpose

FLC's Code of Conduct for Suppliers will describe the objectives and guidelines that shall be applied whenever any FLC employee carries through an evaluation of a potential Supplier. The Code of Conduct will not stand alone, but will be an integral part of the evaluation that will secure that subcontractors and suppliers fulfil the standards set by FLC's Management with regard to Environmental and Social Responsibility and Business Ethics comprehensively.

### 3. Scope

FLC's Code of Conduct will be internationally valid. All FLC employees, with the authority of purchasing and contract engaging, shall be introduced to the FLC Code of Conduct and these employees shall ensure that all Suppliers and their sub contractors and suppliers shall comply fully with this code.

### 4. Business ethics

FLC will only conduct business with Suppliers who will demonstrate business integrity, professionalism and operate in accordance with applicable legislation, and in accordance FLC will require that,

- Supplier shall refrain from bribing, or using any other method to unjustly influence public officials, the judiciary and/or private parties.
- Supplier's contracts with agents, intermediaries and consultants shall include a section on anti-corruption and that the contract holder must comply with all applicable laws and regulations.
- Supplier must have the procedures in place, thru the management, to prevent any of above mentioned.

### 5. Responsible management

FLC will manage this Code of Conduct in accordance with the overall Code of Conduct given by the Owner and in that respect FLC will require from the Supplier

- Supplier must have procedures in place to identify, determine and handle risks in all areas of this Code of Conduct.



- Supplier must have procedures and well established routines including quality and environmental systems to ensure that conditions in the legislation and in the permits given to carry out the project are complied with.
- Supplier must communicate this Code of Conduct to all relevant employees.
- Supplier must have a grievance mechanism, Whistle blower protection, which will handle any report of this kind.

## 6. Social Responsibility

The Owner has expressed a general concern towards the social responsibility of the employers and by that all employees of the Contractor, consultants and suppliers involved with the planning, design and construction of the Project, and all direct suppliers. In that sense, FLC will apply the following demands,

- Supplier must respect and ensure the working environment in accordance with internationally recognised
- minimum standards on human rights.
- Supplier shall not engage in or support discrimination or harassment, on the basis of race, colour, sex, language, religion, political or other opinion, caste, national or social origin, property, union affiliation, sexual orientation, health status, family responsibilities, age, and disability or other distinguishing characteristics.
- Supplier shall treat all personnel with dignity and respect.
- Supplier's employees must have a written contract and a fair salary and must fulfil all international conventions and Danish, German and EU legislations valid for the employment.
- Supplier must recognise and respect the employee's right to negotiate collective agreements.
- Supplier must not participate in, or benefit from, any form of forced labour including bonded labour, forced prison labour, slavery or human trafficking. Workers must have the freedom of movement during the course of their employment.
- Supplier shall not engage in, or benefit from, the use of child labour. The minimum age of employment shall not be less than 15 years in accordance with the ILO conventions.
- The supplier shall refrain from hiring young workers, below 18 years of age, to perform any type of work, which is likely to jeopardise their health, safety and morals

## 7. Health, Safety and well being

Supplier shall ensure that their workers are offered a safe and healthy working environment. This should include, but not be limited to,

- protection from fire, accidents and toxic substances.

Adequate health and safety policies and procedures, based on best practice and standards, must be established and followed. Supplier shall provide their employees with the protective equipment and training necessary to perform their tasks safely. New employees must be fully informed of occupational safety regulations and environmental protection.

Causes and frequency of all accidents shall be reported.



---

## 8. Environmental protection

Supplier must strive to minimise the adverse environmental impacts of their activities, products and services, through a proactive approach and responsible management of their environmental aspects including, but not limited to:

- Use of scarce natural resources, energy and water
- Emissions to air - noise, odour, dust and other particles
- Releases to water
- Potential and actual soil contamination
- Waste management (hazardous and non-hazardous substances)
- Product issues (design, packaging, transport, use and recycling/disposal)

Supplier shall maintain awareness and incorporate current environmental legislative requirements, which are relevant to the environmental impacts of its activities, products and services. Also, it must ensure legal compliance through training, awareness, operational control and monitoring.

## 9. Products Liability

Supplier shall exercise due diligence when designing, procuring, manufacturing and testing products. This is to protect against product defects, which could harm the life, health or safety of people likely to be affected by such products, or have an adverse impact on the environment.