

# Code of Conduct



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## Introduction by the CEO

The key to our success is an orderly, respectfully and relationship-based cooperation both within our organization and with our business partners.

As part of our commitment to CSR, this Code of Conduct shall serve as a guideline for all employees at Anker Andersen A/S and shall ensure that we always act ethically caring for people and the environment and in the best interest of our company.

The success of our business is based on the trust, respect and commitment we earn from employees and partners, and we only reach our goals through orderly and ethical conduct. In addition, we are committed to making efforts to apply our values and norms throughout the entire value chain of our suppliers, service providers and business partners.

As an Anker Andersen employee and as our business partner you have an obligation to comply with these rules of conduct defined by the management. You are expected to read, understand and adhere to the policies and procedures and to ask questions in case of any uncertainty.



Anders Topp Daugaard  
CEO



## 1. Scope of application

This Code of Conduct is binding for all employees at Anker Andersen A/S, and any non-compliance to the Code is considered as a misconduct. In addition, we expect external business partners to act in line with this Code as well.

*This code of conduct is binding for all of us!*

## Business conduct and reputation of the company

*We are all ambassadors!*

We are all committed to acting orderly, responsibly and fairly in our daily business dealing with customers, suppliers, colleagues and all other stakeholders. All employees must bear in mind that we are ambassadors who contribute to our common reputation.

## 2. Laws and regulations

Our commitment to orderliness and integrity begins with complying with laws, rules and regulations of the countries we are dealing with. We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

*We comply with laws and regulations!*

## 3. Dealing with third parties

### 3.1 Competition and anti-trust law

*Our business is founded on orderliness!*

Anker Andersen A/S' business practices are based on universal values of orderliness and honesty. We are trustworthy in our dealings with business partners and authorities.

We are committed to complying with all applicable competition and anti-trust laws. Price fixing and any distortions of competition are prohibited.

### 3.2 Anti-bribery and corruption

We have a zero-tolerance approach towards bribery and corruption. This does, however, not prohibit normal and appropriate hospitality given or received. If you are in doubt, please contact your immediate manager or the CEO.

*We must not accept or offer a bribe of any kind!*

### 3.3 Gifts and donations

*Not sure whether you are permitted to give or accept a gift? Ask your immediate manager!*

Entertainment, hospitality and exchange of gifts are considered common practice and part of building and maintaining business relationships. It is permissible to give and accept business gifts of minor value, however, you must be careful that the exchanges cannot be perceived as an unfair influence and give rise to any obligations.

We recognize the importance of support to local communities and donations to charity. The management decides on any donations which are to be made.

## 4. Human rights and responsibilities

We strongly believe that human rights are fundamental and should be protected at all times. We are committed to fair employment practices and equality of opportunity and treatment. We are firmly opposed to child labour, forced labour and exploitation.

*We do not tolerate any form of discrimination!*

We shall act with integrity and treat our colleagues and others with full respect and must not participate in or support discrimination.

## 5. Health and safety

*Be mindful of your own and your colleagues' health and safety!*

All employees at Anker Andersen A/S are entitled to a healthy, safe and secure workplace, where no one is exposed to unnecessary risk. Safety must be ensured through appropriate instructions and training defined by the management. Safety measures must be observed both internally and externally.

All employees are, however, responsible for their own health and safety when performing their work and must therefore comply with all safety regulations and processes as well as exercise proper care to prevent accidents. Anker Andersen A/S prohibits the consumption or being under the influence of alcohol or drugs at work.

## 6. Sustainability and protection of the environment

Environmentally sound business practice to support a sustainable world is about meeting our responsibility and always aiming at reducing the environmental impact related to our activities. We make efforts to reduce the use of finite resources like energy and water, and we sort our waste in our production and administration.

*Help to ensure efficient use and conservation of resources!*

As one of the leading global manufacturers of counting and sorting systems for used beverage containers we highly play an active role in an environmentally sound global development, ensuring an increase in the reuse of raw materials leading to a reduction of CO<sub>2</sub> emission.

## 7. Processing of information and company property

*Treat internal matters confidentially and our property with respect!*

We must all respect and protect the confidentiality of information belonging to Anker Andersen A/S and our business partners, and we expect you to be loyal to our strategy and our values.

Tools, equipment and materials provided by Anker Andersen A/S are to be handled with due care and in an appropriate manner. Private use of company property is only allowed with relevant approval by your immediate manager.

The misappropriation of Anker Andersen A/S property is not permitted under any circumstances and might have legal consequences.

To comply with data privacy legislation, we observe the legal requirements and follow related procedures to ensure legality of personal data handling.

## 8. Conflict of interest

Business shall always be conducted in Anker Andersen A/S's best interest and decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence

It is the responsibility of all of us to exercise sound judgment regarding conflict of interest and to seek advice, when in doubt.

*Avoid any personal interest that interferes with the best interest of AA!*

## 9. Speak up – Whistleblower system

We are all encouraged to speak up when we know of or suspect any irregularities or improper actions that have been committed or are likely to be committed.

*If you discover or suspect any breaches or experience inappropriate behaviour, we encourage you to speak up!*

To promote transparency and to safeguard our compliance culture, Anker Andersen A/S has established a whistleblower system for employees to report any potential misconduct. This system is hosted by an independent provider and enables employees to report any concern about breaches of the Code of Conduct or other inappropriate behaviour so relevant action can be taken. Reports can be made anonymously if the reporter wishes to do so. The reporter is protected from retaliation, whether the report is made anonymously or not.