

APPENDIX III

SUPPLIER CODE OF CONDUCT

1. Introduction

- 1.1. At Creativ Company, we believe that creativity, play and learning is the key to developing a world of sustainable growth and development. Our vision is to build a sustainable business model that delivers products through a responsible and ethical value chain, where every supplier and business partner play an essential role in our shared success. We are committed to our ambition; creating a culture that prioritizes the well-being of people and the planet. We wish to create lasting value for our customers, employees and business partners by working towards fair treatment, safe working conditions, and opportunities for growth for everyone in our supply chain. We strive to reduce our environmental footprint by embracing innovation, reducing waste, and promoting the efficient use of resources. Our goal is to create and sell products that not only meet the highest quality standards and improves the creativity, play and learning of our customers, but also contributes to a healthier planet for future generations.

This supplier Code of Conduct outlines the expectations and standards that Creativ Company ("CC") expects all suppliers and business partners ("**Suppliers**") to adhere to, thus enabling us to achieve our vision and ambition described above. Compliance with the Code of Conduct is a mandatory requirement for engaging with CC, and all Suppliers are expected to implement these practices within their operations.

We expect all Suppliers to communicate the Code of Conduct to their sup-suppliers and to actively make sure that the principles and standards are passed on downstream in their supply chain, thereby extending the values and the culture of CC. Upon request from CC the Supplier must be able to demonstrate and document the process by which the Supplier ensures this requirement down the supply chain.

- 1.2. The standards and principles within the Code of Conduct are based on and inspired by internationally recognized principles such as The Universal Declaration of Human Rights, International Labour Organization (ILO) Conventions and Recommendations, UN Global Compact, The Guiding Principles on Business and Human Rights, environmental legislations and requirements etc., to ensure ethical business practices, respect for human rights, and environmental sustainability. Furthermore, Suppliers are required to comply with all applicable laws, regulations, and industry standards in every jurisdiction where they operate. This includes laws related to labour, health and safety, environmental protection, anti-corruption, and fair business practices.

2. Human Rights Principles

- 2.1. In CC we believe that it is our responsibility to commit to identifying, preventing and mitigating any negative human rights impacts which we may cause or contribute to through our own activities or the activities within our supply chain. Therefore, we expect all our Suppliers to support and respect human rights and to ensure that their operations do not cause or contribute to human rights abuses in accordance with UN Global Compact principles 1 and 2.
- 2.2. Respecting and supporting human rights within the workplace must be ensured by committing and adhering to the labour principles mentioned below such as providing safe and healthy working conditions for all workers. CC encourages all Suppliers to create opportunities for vulnerable groups within the community and to actively protect and support local communities.

3. Labour Principles

- 3.1. All Suppliers must respect the rights of workers to freely and voluntarily establish and join groups for the promotion and defence of their occupational interests in accordance with UN Global Compact principle 3.

Suppliers should maintain an open dialogue with worker representatives and ensure that workers can communicate grievances without fear of retaliation. Furthermore, we encourage all Suppliers to create non-discriminatory policies and procedures with respect to trade union organizations, union memberships and activities such as collective bargaining.

- 3.2. Suppliers must not use any form of forced, bonded, or involuntary labor. All work must be voluntary, and workers must have the freedom to terminate their employment with reasonable notice. Providing wages or other compensation to a worker does not necessarily indicate that the labour is not forced or compulsory. Suppliers must ensure that all workers have full control over their identification documents and are not subject to debt bondage. The Supplier must provide employment contracts to all employees stating the terms and conditions of service, the voluntary nature of employment, the freedom to leave (including the appropriate procedures) and any penalties that may be associated with a departure or cessation of work in accordance with principle 4 in UN Global Compact.

- 3.3. Suppliers must not engage in or benefit from the use of child labor. The minimum age for employment must comply with the national legal standards or be at least 14 years old in developing countries and 15 years old in developed countries in accordance with the ILO conventions No. 138 and No. 182, whichever is higher. The minimum age for employees conducting hazardous work must be 18 years in all cases. All Suppliers are expected to use adequate and verifiable mechanisms for age verification in recruitment procedures in accordance with UN Global Compact principle 5 and must be able to always provide documentation for the age of all employees.

- 3.4. Aligning with principle 6 in UN Global Compact Suppliers must provide an inclusive workplace free from discrimination or harassment. Employment decisions must be based on qualifications, skills, and experience, without regard to race, color, age, gender, sexual orientation, disability, religion, political affiliation, union membership, or marital status. Suppliers must uphold the elimination of discrimination in respect of employment and occupation in all aspects of the business including in recruitment, remuneration, advancements, maternity protection etc., and should promote equal opportunities and diversity within their workforce. Furthermore, we encourage all Suppliers to issue clear company-wide policies and procedures as guidance to a tolerant and equal working environment.

- 3.5. Suppliers must pay workers fair wages that meet or exceed the legal minimum wage and must ensure that all applicable laws and industry standards are complied with. Wages should be sufficient to meet the basic needs of workers and their families preferably in accordance with ILO Recommendation No. 135 regarding Minimum Wage Fixing. Suppliers must also provide all legally mandated benefits, including paid leave, social insurance, and severance pay, and ensure that deductions from wages are not excessive or punitive. In addition, Suppliers must ensure that working hours do not exceed the legal limits and that workers are not subjected to excessive overtime, and we encourage our Suppliers to adhere to ILO's Guide to Developing Balanced Working Time Arrangements. Workers should be granted at least one day off for every seven-day work period. Any overtime work should be voluntary and compensated at the appropriate premium rate.

- 3.6. Suppliers must provide a safe and healthy work environment for all workers that complies with all relevant laws and regulations and must take all appropriate measures to achieving it. This includes identifying and mitigating potential hazards, providing necessary safety training, and ensuring that workers have access to clean drinking water, sanitation facilities, and appropriate personal protective equipment (PPE). All Suppliers must commit to take effective measures to prevent workers from having accidents, injuries, or illnesses, arising from, associated with, or occurring during work, and must maintain records of all health and safety incidents in the workplace.

4. Environmental Principles

- 4.1. Aligning with principle 7, 8 and 9 in UN Global Compact all Suppliers must strive to minimize and mitigate their negative impact on environmental challenges and must undertake all reasonable measures to promote greater environmental responsibility including reducing waste, managing hazardous substances responsibly, minimizing emissions, and using resources efficiently. Furthermore, we encourage all Suppliers to adopt environmentally sustainable practices, such as using renewable energy, reducing water consumption, and promoting recycling. We expect Suppliers to continually improve their environmental performance and to be transparent about their environmental impact including providing environmental insight when asked. This includes defining strategies and environmental targets, measuring and providing CC with reports regarding the environmental impact and progress.
- 4.2. Given the increasing environmental regulations facing businesses across Europe and many other countries, it is essential that our Suppliers actively contribute to ensuring full compliance with these legal requirements. As our production is outsourced to Suppliers within our supply chain, we rely on your cooperation to meet our obligations. Suppliers are expected to provide accurate, timely, and comprehensive data and information regarding their environmental practices, including but not limited to, resource use, emissions, waste management, and product safety. Without your commitment and transparency, we cannot meet our regulatory commitments. Failure to provide the necessary data may lead to a re-evaluation of our business relationship.

5. Anti-Corruption Principles

- 5.1. Suppliers must not engage in any form of corruption, including bribery, kickbacks, or extortion. All parts of the business must be transparent and accurately recorded in accordance with applicable legislation and international conventions such as UNCAC and OECD Guidelines for Multinational Enterprises. Suppliers must have policies in place to prevent corruption and to promote integrity in all business transactions, aiming to avoid situations where personal or financial interests could affect decision making thereby securing that decisions are made impartially in accordance with UN Global Compact principle 10.
- 5.2. Suppliers must conduct business in accordance with fair competition and antitrust laws. They must not engage in practices that distort competition, such as price-fixing, bid-rigging, or market allocation. Suppliers should compete fairly and honestly in the marketplace.

6. Responsible sourcing of Minerals

- 6.1. Suppliers who deliver products containing tin, tantalum, tungsten, gold, or other minerals sourced from conflict-affected areas (CAHRA-countries) must follow the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA). The Supplier must ensure that the minerals used in their products originate from responsible sources and do not contribute to conflict, corruption, forced labor, or human rights abuses. Suppliers are expected to follow the principles of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and to implement appropriate due diligence processes within their own supply chains. Suppliers must be able to disclose the origin of minerals and demonstrate active efforts to identify, prevent, and mitigate risks.
- 6.2. Suppliers delivering products containing the relevant minerals must maintain full transparency regarding their mineral supply chains and provide all necessary information upon request, including risk assessments, traceability data, and audit results. If risks are identified, the Supplier is expected to implement corrective actions without undue delay and cooperate with the company in striving for continuous improvement.

7. Monitoring and Compliance

- 7.1. CC expects all Suppliers to implement the necessary systems, procedures and policies that are appropriate to the size and nature of their business to ensure compliance with our Code of Conduct. This includes establishing and maintaining procedures for identifying, managing, and mitigating risks, documentation and record-keeping to demonstrate compliance and providing regular training programs for employees on ethical conduct, health and safety, and environmental responsibility.
- 7.2. In addition to the internal compliance measures mentioned above, the Supplier must participate in the internal audit process of CC. The internal audit consists of a mandatory Supplier Self-assessment Questionnaire ("**SAQ**"). The SAQ serves as a tool allowing CC to evaluate the risks and the level of compliance of each Supplier. The SAQ will be forwarded at a minimum of once every 12 months and failure to respond to the SAQ will be viewed as a violation to this Code of Conduct potentially resulting in termination of the collaboration with CC. Upon request from CC the Supplier must ensure that the SAQ is passed on to all sup-suppliers.
- 7.3. If significant risks or suspected non-compliance are identified through the SAQ, CC may require immediate corrective actions by the Supplier as a condition for continued collaboration. To eliminate any doubts regarding the Supplier's adherence to compliance standards, CC may also require an external audit conducted by amfori BSCI. Any costs associated with these requirements shall be the responsibility of the Supplier. Furthermore, the Supplier is required to provide full access to on-site inspections and to all relevant records if such inquiry is made by CC.
- 7.4. If a Supplier is audited by an external partner, such as SEDEX or amfori BSCI, upon entering into collaboration with CC, the Supplier is expected to maintain a valid audit report for the entire duration of the partnership. Should the audit report expire, and the Supplier decides not to seek renewal, CC must be promptly notified in writing.
- 7.5. We encourage everyone, both within CC and across our supply chain, to use our whistleblower system to report any observed or suspected behavior that conflicts with responsible business practices or this Code of Conduct. The whistleblower system is accessible to everyone, both inside and outside the organization, via our website.

8. Conclusion

8.1. We encourage all our Suppliers to maintain transparency in their operations, fostering an open and honest relationship that benefits both parties. Our commitment extends beyond compliance; we are dedicated to elevating the entire supply chain, working collaboratively to achieve mutual success. By upholding high standards of ethical conduct and sustainability, we can create long-term value for our customers and simultaneously contribute to a more responsible and resilient supply chain. Together, we can make a positive impact in the communities we serve and the environment we share, thereby fulfilling our ambition of creating a culture that prioritizes the well-being of people and the planet.

Signatures

Date:
Name and Title:
Signature and stamp:

Date:
Name and Title:
Signature and stamp:

SUPPLIER NAME

Creativ Company A/S