

CODE OF CONDUCT

PURPOSE

Mannaz A/S is committed to conducting business in an **ethical, sustainable, and socially responsible manner**. This *Code of Conduct* (CoC) aligns with EU sustainability standards and the United Nations Sustainable Development Goals (SDGs). We comply with all applicable laws, regulations, and standards, including EU directives on corporate sustainability due diligence and international standards on human rights and environmental protection.

We are all responsible for maintaining **high ethical standards** and will be held accountable for following this CoC, as well as all related ethic compliance & sustainability policies (as listed in Appendix).

By adhering to these principles & rules, Mannaz A/S aims to foster a culture of sustainability, responsibility, and ethical business conduct, contributing to a better future for all.

SCOPE

This *Code of Conduct* is our guide outlining expected behaviours, responsibilities & ethical business standards. It applies to all Mannaz employees, managers, associates & external business partners acting on behalf of Mannaz.

Employees are required to:

- **Follow the Code:** Apply its principles in your daily work.
- **Seek Guidance:** If you have doubts about ethics or compliance issues, contact early for guidance, either directly by contacting or Head of HR or CEO.
- **Promote Standards:** Share Mannaz ethics and compliance expectations with colleagues, third parties, and external stakeholders.
- **Report Violations:** Speak up about possible or actual breaches of the Code.

Managers have additional responsibility to:

- **Educate Employees:** Ensure your team understands *the Code of Conduct* and works ethically.
- **Encourage Openness:** Foster a culture where ethical concerns are voiced and addressed. Make sure employees know how to report ethical issues.
- **Lead by Example:** Model ethical decision-making, behaviours and mindset.
- **Value Integrity:** Show that achieving results by adhering to principals of business ethics is what truly matters.

While this *Code of Conduct* addresses the essential aspects of business ethics for our operations and daily activities, there may be situations not explicitly covered. If you're unsure about how to act or apply these standards, please consult our Head of HR for further guidance.

PRINCIPLES

1. Human Rights and Labor Practices

- 1.1. Respect for Human Rights: We uphold and respect all human rights as outlined in the Universal Declaration of Human Rights & *Mannaz Labor & Human Rights Policy* (Appendix 2).
- 1.2. Fair Labor Practices: We ensure fair labour practices, including non-discrimination, fair wages, and safe working conditions, in line with SDG 8 (Decent Work and Economic Growth).
- 1.3. No forced & child labour: We do not engage in any form of forced or child labor and human trafficking.

2. Health & Safety

- 2.1. Physical Safety & Work Environment: We are committed to providing a safe, healthy, and clean working environment. All employees must adhere to safety protocols and report any unsafe conditions immediately. We prioritize the well-being of our workforce and strive to eliminate work-related injuries and hazards.
- 2.2. Psychological Safety: We are committed to fostering a psychologically safe work environment where all employees feel respected, valued, and able to express themselves without fear of negative consequences. We value Inclusion & Diversity in day-to-day work & all business interactions. Any form of harassment, discrimination, bullying or aggression is strictly prohibited.
Harassment refers to any unsolicited/unwanted physical and/ or verbal behaviour that offends, humiliates and/or degrades you. Harassing behaviours can be a severe/direct one-time act

and/or repetitive micro-actions over time. These behaviours include inappropriate verbal and written communication and/or behaviours/actions that leave anyone from feeling uncomfortable to feeling violated, as well as behaviours/actions that create an intimidating, hostile and/or offensive environment for the victimised person.

Types of behaviours categorized as harassment also include:

- ❶ Bullying involves repetitive exclusion, verbal/physical humiliation, denigration, and intimidation over time.
- ❷ Aggressions verbal, written or physical, that are intimidating & threatening toward others.
- ❸ Sexual harassment is unwanted/inappropriate sexual attention/actions (verbal, pictures, written or physical).
- ❹ Discrimination as defined below.

Discrimination refers to the unjust and prejudicial treatment of people and groups based on their characteristics and identities. This includes behaviour such as psychological, physical, and/or verbal actions that make a person feel uncomfortable, humiliated or distressed. Discriminatory behaviour and/or actions (direct and/or indirect) based on age, disability, gender identity, race & ethnicity, religion, and/or sexual orientation (the protected six) is categorised as discrimination.

Employees are encouraged to speak up about any concerns and will be supported in doing so by giving immediate feedback to the colleague/s involved, raising this issue with direct manager, Head of HR, CEO or CFO. This procedure along with all definitions & relevant information on harassment

& discrimination is described in detail in Mannaz Anti-Harassment Policy (Appendix 5).

3. Environmental Responsibility

3.1. Environmental Sustainability Practices: We are committed to minimizing our environmental impact through sustainable practices, in alignment with SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action) & *Mannaz Sustainability Policy (Appendix 3)*.

3.2. Resource Efficiency: We strive to use resources efficiently and reduce waste and emissions in our operations.

3.3. Travel Guidelines: In Mannaz, we recognize our impact of increasing travel activities on our greenhouse gas emissions. As part of our journey to reducing our carbon footprint, **all employees and associates** are required to review and adhere to the travel guidelines whenever feasible, recognizing that travel needs may vary depending on the project and country.

- o **Travel** should be minimized to reduce emissions.
- o **Air travel** and **travel by ship** not related to client delivery should be minimized & should only be used when no other practical alternative is available.
- o **Frequent travels** to the same destination should be avoided. Please plan & reschedule your trips accordingly.
- o **Environmental impact** of the trip should always be considered by exploring remote work, virtual meetings & delivery solutions before booking a trip.

If work cannot be completed virtually or travel is necessary for a valid business reason:

- o Seek more **sustainable travel options** such as rail or public

transportation, select airlines with strong environmental records and prioritize eco-certified or eco-friendly hotels.

- o **Travel light**: as less luggage means less fuel consumption for planes, trains & cars.
- o **Avoid single-use plastics**: Bring reusable water bottles, bags, and utensils to minimize plastic waste during your travel time.
- o **Support local businesses**: buy from local markets, eat at locally owned restaurants, and use local tour operators. This supports the local economy and reduces the carbon footprint associated with transporting goods.
- o **Respect local cultures and environments**: be mindful of local customs and traditions, and avoid activities that harm wildlife or natural habitats.
- o **Choose sustainable activities**: engage in eco-friendly activities like hiking, cycling, or wildlife watching, and avoid those that exploit animals or damage ecosystems.

4. Ethical Business Conduct

4.1. Integrity and Transparency: We conduct our business with integrity and transparency, ensuring honesty and fairness in all our dealings.

4.2. Fraud: We are committed to preventing & deducting fraud; we do not engage in any kind of acts of wrongful or criminal deception intended to result in financial or personal gain such as theft, embezzlement, money laundering, misuse or forgery, manipulation of information & any other illegal or improper behavior.

4.3. Corruption & improper advantages: We have zero tolerance for all forms of



corruption & bribery in accordance with SDG 16 (Peace, Justice, and Strong Institutions). We define corruption as the abuse of entrusted power for personal gain. This can include actions such as embezzlement, fraud, or any other unethical behaviour that compromises the integrity of the company or its operations. Bribery involves offering, giving, receiving, or soliciting anything of value to influence the actions of an individual in a position of trust. This can include money, gifts, or favours intended to sway decisions or actions in favour of the briber. Such actions can lead to conflicts of interest and are prohibited. Legitimate business expenses (meals, travel, product samples) may be allowed by law and company policy. Using both personal and company funds for bribes is against our *Code of Conduct*.

If an employee experiences any corruption in any form while working with colleagues, clients, associates, partners, suppliers etc. He/she should immediately (and within 24 hours) inform HR, HR will advise how to act accordingly. Any employee found engaging in such activities will face immediate disciplinary action, up to and including termination

- 4.4. Conflict of Interest: Our decisions are free from personal gain. We rely on objective criteria and professional judgment, avoiding influences from personal, social, financial, or political interests. We always prioritise merit in recruitment, procurement, delivery, or any other situation.
- 4.5. Anti-Competitive Practices: We avoid taking any actions to unfairly limit competition in the market such as price fixing, bid-rigging, market division and tying.
- 4.6. Information & Data Security: We handle sensitive information responsibly, using

encryption, authentication, and access controls to prevent unauthorized access in line with relevant laws and regulations like GDPR. We keep information confidential and use it only for authorized purposes. We report data breaches or security incidents promptly to minimize damage. We collect, use, and dispose of data ethically and legally as described in *IT Security Policy* (Appendix 5).

5. Supply Chain Management

- 5.1. Sustainable Procurement: We engage with suppliers who adhere to sustainable procurement standards and can demonstrate compliance with environmental and social best practices. Our key suppliers sign *Supplier Code of Conduct* (Appendix 4A), assuring us that they are also adhering to our principles in their operations. All suppliers & employees engaged in purchasing process are obliged to follow the process & principles elaborated on in *Mannaz Sustainable Procurement Policy* (Appendix 4B).
- 5.2. Supply Chain Monitoring and Assessment: We regularly assess our suppliers' sustainability practices through questionnaires and audits to ensure compliance with relevant EU directives and international standards.

6. Community Engagement

- 6.1. Local Communities: We support and engage with local communities, contributing to their development and well-being.
- 6.2. Stakeholder Collaboration: We collaborate with stakeholders, including governments, NGOs, and other organizations, to promote sustainable development.

7. Continuous Improvement

- 7.1. Innovation and Improvement: We continuously seek to improve our sustainability practices and innovate to meet emerging challenges and opportunities.
- 7.2. Training and Awareness: We provide training and raise awareness among our employees and partners about our ethical standards and sustainability goals.

8. Reporting and Accountability

- 8.1. Transparency in Reporting: We are committed to transparent reporting of our sustainability performance and progress towards achieving the SDGs and our Mannaz Sustainability Targets.
- 8.2. Accountability: We hold ourselves accountable to our stakeholders and take responsibility for our actions and their impacts.

NON-COMPLIANCE

Any affiliated person aware of a breach of this *Code of Conduct* must **inform/report to** Mannaz immediately.

Either directly to the involved parties or confidentially by contacting the Head of HR or CEO. Or through Mannaz whistleblower scheme.

<https://whistleblowersoftware.com/secure/9a578999-03bc-426a-8e09-59adf0834246>

All reports will be investigated thoroughly and impartially. If Mannaz suspects a breach of the *Code of Conduct* by employee or any affiliated person, it will notify the person involved.

Misconduct & breach of the ethics requirements can lead to disciplinary sanctions or discontinued business collaboration dependent on the scale & nature of the breach & aligned with national legislation.

CEO'S STATEMENT

At Mannaz, we are committed to conducting business with the highest standards of integrity and professionalism. Our Code of Conduct & Business Ethics guides our actions and decisions, ensuring we operate transparently and ethically in all our dealings. We believe that maintaining these principles is essential for building trust with our clients, partners, and employees, and for fostering a sustainable and inclusive work environment.

Marianne Egelund Siig, CEO Mannaz A/S



For inquiries, feedback, or grievances related to this policy, please contact Head of HR, Marianne Bondo Nielsen, mbn@mannaz.com or CEO, Marianne Egelund Siig, mes@mannaz.com.

Version 1, September 2024



Appendix

Appendix 1: Mannaz Code of Ethics – *update link once definitive version is approved.*

[Code of Ethics.pptx](#)

Appendix 2: Mannaz Labor & Human Right Policy

[Mannaz Labour & Human Rights Policy.pdf](#)

Appendix 3: Mannaz Sustainability Policy

[Mannaz Sustainability Policy.pdf](#)

Appendix 4A: Supplier Code of Conduct

[Mannaz Supplier Code of Conduct.pdf](#)

Appendix 4B: Sustainable Procurement Policy

[Mannaz Sustainable Procurement Policy.pdf](#)

Appendix 5: Mannaz Anti-Harassment Policy

[Mannaz Anti-Harassment Policy.pptx](#)

Appendix 6: IT Security Policy

[Mannaz IT Security Policy.pdf](#)



For internal use

	Name	Date	Version
Created by:	Karolina Wodyk	05-09-2024	1
Reviewed by:	Marianne Bondo Nielsen Berit Kristine Bøggild Martin Søgaard Nielsen	20-09-2024	1
Approved by:	Marianne Egelund Siig	20-09-2024	1