

CSR Policy – Code of Conduct



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Issued by: Alex Olsen	Date of issue: Oct. 14 th 2015	Valid for: Consumer, Fillet
System Approver: Executive Board of Directors	Valid from: Dec. 4 th 2015	Valid in: Fredericia, Hasle, Ho Chi Minh City, Koszalin, Klaipeda, Novgorod

"We do, what we say that we do" is one of our values and is fundamental to the Espersen Code of Conduct.

We are committed to conducting business in an ethical manner, and we will not support any public or private organization with discriminatory policies or practices.

At Espersen, we will always adhere to national and international laws. We continuously strive to improve the welfare of our workers beyond this through our Worker Welfare Programme. We work in partnership with our suppliers to implement these additional initiatives at site-specific locations to deliver benefits over time.

Human Rights

We conduct our operations with honesty, integrity, openness, respect and are committed to upholding the human rights of people as set out in The United Nations Universal Declaration of Human Rights. This includes:

Freedom of Association:

We respect the dignity of the individual and the right of employees to associate or not to associate with any group, as permitted by and in accordance with all applicable laws and regulations.

Employment Practices:

We do not use, or in any other way benefit, from forced labour. Forced refers to any form of indentured servitude such as the use of physical punishment, confinement, threats of violence as a method of discipline or control such as retaining employees' identification, passports, work permits or deposits as a condition of employment.

Neither do we use any form of slave, bonded or involuntary prison labour nor engage in human trafficking or exploitation, or import goods tainted by slavery or human trafficking.

In the case of employment through third party labour agencies we ensure that, our agreement with the agency comply with Convention No. 181 of the ILO on Private Employment Agencies.

We will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed.

We are committed working with employees to develop and enhance each individual's skills and capabilities.

We only employ workers who are legally authorized to work in our location and facility and are responsible for validating employees' eligibility to work status through appropriate documentation.

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Minimum Age for Employment:

We do not accept any use of child labour in our facilities. If minimum employment age is not specific in national laws, we follow the ILO Convention 138 on the Minimum Age, which defines child labour to be any worker below 15 years old.

When employing young workers, we do not expose them to undue physical risks that can harm physical, mental or emotional development.

Fair and Equal Treatment:

We are committed to diversity in a working environment where there is mutual trust and respect and where everyone feels responsible for the performance and reputation of our company.

We do not discriminate in hiring and employment practices on the grounds of criteria such as of race, colour, religion, gender, age, physical ability, national origin, sexual orientation, political affiliation, union membership, medical tests, or marital.

We do not tolerate any form of psychological, physical, sexual or verbal abuse, intimidation, threat or harassment. In addition, we respect the privacy rights of its employees whenever it gathers private information or implements employee-monitoring practices.

If we contract external companies to provide e.g. security to safeguard its personnel and property, we expect that security personnel apply the same standards on fair and equal treatment.

Working time and rest days:

It is our responsibility that all our employees work in compliance with all applicable laws and mandatory industry standards pertaining to regular working hours, and overtime hours, including for breaks, rest periods, holidays, and maternity and paternity leaves. Any overtime worked will be voluntary and compensated at premium rate. In absence of law, a regular workweek including overtime cannot be more 60 hours and workers shall be provided with at least one day off for every 7-day period on average.

Wages and benefits:

We pay all workers lawful wages, including overtime, premium pay and equal pay for equal work without discrimination. There will be no disciplinary deduction from pay.

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Health and Safety

We are committed to providing a safe and healthy working environment for all employees. This includes:

Workplace Environment

We provide a safe and healthy working environment to our employees. This includes potable drinking water, adequate lighting, temperature, ventilation, sanitation, and personal protective equipment together with equipped workstations.

Our facilities are constructed and maintained in accordance with the standards set by applicable laws and regulation.

We provide all workers with communication and training on emergency planning and safe work practices.

For each of our facilities we have a procedure to prevent, detect and respond to potential risk of the safety, health and security of all employees.

Emergency Preparedness

For all our facilities, we have written emergency plans. These includes worker notification and evacuation procedures, emergency training and drills, appropriate first-aid supplies, fire detection and suppression equipment and adequate exit facilities. We train all employees on emergency planning including, fire drill. We review all emergency plans annually and updated these if needed. A sufficient number of employees are trained in medical care.

Environmental Management

Espersen comply with all applicable legal environmental requirements. We are committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business. We manage and measure the environmental impact of our facilities. Specific focus areas include air emissions, waste reduction, recovery and management, water use and disposal, and greenhouse gas emissions.

We follow the reporting guidelines of all the required environmental permits and registrations.

Business Integrity

Compliance with Law

We comply with the laws and regulations of the countries in which we operate.

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Anti-bribery

Espersen enforce a strict zero-tolerance approach to instances of bribery, kickbacks, corruption, extortion or embezzlement. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

Grievance mechanisms

We have in place procedure for handling reports of workplace grievances, including anonymous reports.

Conflict of Interest

We expect all employees to avoid personal activities and financial interests, which could conflict with their responsibilities to the company.

Whistle-blower Protection

We encourage all employees and partners to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment.

Retaliation in any form against an individual who reports a violation of this Code of Conduct or of law, even if the report is mistaken, or who assists in the investigation of a reported violation, is itself a serious violation of this policy. Acts of retaliation should be reported immediately and will be disciplined appropriately.