

Dantrafo Code of Conduct

General

At Dantrafo A/S we promote good practice on ethics for both internal matters and external matters related to our supply chain. The Code of Conduct covers legal compliance, disclosure of information, intellectual property, human rights and labor conditions, environmental and climate protection, protection of natural resources and fair operating practices.

Legal Compliance

Comply with the local laws and regulations.

Disclosure of Information

Information regarding Dantrafo A/S business activities, structure, financial situation and performance shall be company confidential and only disclosed in accordance with applicable local laws and regulations.

Intellectual Property

Intellectual property rights shall be respected; the transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

Human Rights and Labor Conditions

Dantrafo A/S will ensure respect of human rights and labor conditions.

Prohibition of Forced Labor

- Neither use nor contribute to slavery, servitude, forced or compulsory labor, suppression, exploitation, and human trafficking.

Prohibition of Child Labor

- Install no workers under the age of 15
- Install no workers under the age of 18 for work which is likely to harm the health, safety, and morals.

Non-Discrimination and Respect for Employees

- Ensure equal treatment of employees, irrespective of skin color, race, nationality, ethnicity, social background, disabilities, gender, sexual identity and orientation, marital status, political or religious conviction, or age and promote equal opportunities amongst them.
- Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language, and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Freedom of Association

- Recognize the legal rights of workers to form or join existing trade unions; neither

disadvantage nor prefer members of employee organizations or trade unions.

Working Hours, Wages & Benefits for Employees

- Adhere to all applicable working-hours regulations.
- Pay fair wages for labor and adhere to all applicable wage and compensation laws.

Occupational Health & Safety, Security Forces

- Act in accordance with the applicable standards regarding occupational health and safety and provide safe working conditions.
- Provide training to ensure all employees installed are educated in health & safety issues.
- Establish a reasonable occupational health & safety management system.

Grievance Mechanism

- Provide access to a protected mechanism for their employees to report possible violations of the principles of this Code of Conduct and ensure protection of whistleblowers or complainants against retaliation.

Environmental and Climate Protection, Protection of Natural Resources

- Act in accordance with the applicable local laws and regulations.
- Minimize environmental pollution and make continuous improvements in environmental protection.
- Establish a reasonable environmental management system.
- Reduce the emission of air pollutants and Greenhouse Gas (GHG), and reduce harmful soil change, water pollution and harmful noise emission to the fullest extent as possible.
- Increase energy efficiency, use renewable energy, and reduce water consumption to the fullest extent as possible.
- Cause no unlawful taking of land, forests, and waters.
- Reduce waste and ensure their proper treatment and disposal.

Fair Operating Practices

Anti-Corruption and Bribery

- Tolerate no form of and do not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.

Fair Competition, Anti-Trust Laws

- Act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with

competitors.

Conflicts of Interest

- Avoid conflicts of interest that may influence business relationships

Anti-Money Laundering, Terrorism Financing

- Not directly or indirectly facilitate money laundering or terrorism financing.

Data Privacy

- Process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.

Foreign Trade Regulations

- Comply with the applicable export, import, customs, and foreign trade regulations.

Responsible Minerals Sourcing

- Take reasonable efforts to avoid in its products the use of raw materials which originate from Conflict-Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

Supply Chain

- Use reasonable efforts to make its suppliers comply with the principles of this Code of Conduct
- Comply with the principles of non-discrimination with regard to supplier selection and treatment.

Date / Signature

2024-07-03, Ivan Gam

Ivan Gam, CEO