

DUNI GROUP (CORP. REG NO. 556536-7488)

Business Partner Code of Conduct

Adopted December 2022

Updated July 2024

Approved by Duni AB Board of Directors at the Board Meeting in
July 2024

DUNI
GROUP

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1. Objectives of and compliance with this code

Sustainability, social and ethical responsibility are important to Duni Group. Respect for human rights, fair and safe working conditions, and ethical business practices are essential to our business, and we expect the same from partners we do business with. This Business Partner Code of Conduct (the “Code”) applies to all business partners of the Duni Group such as suppliers, distributors, agents and other partners (“Business Partners”) and outlines the minimum requirements that apply for all business relationships between Duni Group and our Business Partners. Additional requirements for suppliers are detailed in the **General Requirements for Suppliers of finished goods and raw materials**.

The standards set out in this Code are based on internationally recognised treaties and agreements such as the United Nations Global Compact’s ten principles, the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labour Organization (ILO) Conventions.

Business Partners are strongly encouraged to observe international and industry standards and best practices.

The term “Employee” used throughout this Code covers everyone working for or on behalf of a Business Partner, including but not limited to full and part-time employees, consultants, contractors, trainees, temporary workers, migrant workers, senior management and board of directors.

2. Compliance with laws

Business Partners must comply with all applicable laws, regulations and standards, as well as the requirements set out in this Code and other specific requirements agreed upon between the parties, even when this Code or such other requirements stipulates higher standards than those required by national laws or other applicable laws and regulations.

If the national legislation sets higher standards than as laid out in this Code, the higher standard shall always have precedence.

3. Human Rights and Labour Standards

3.1 Human Rights

Duni Group expects our Business Partners to respect fundamental human rights and employment rights, including but not limited to the eight core conventions of the ILO, covering the fundamental principles and rights at work that is freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of

child labour and the elimination of discrimination in respect of employment and occupation.

Duni Group encourages our Business Partners to take action to make positive contributions towards the protection of human rights.

3.2 Labour Standards

Without limiting the generality of section 3.1, Business Partners shall not, directly or indirectly, make use of any work or service which is extracted from any person under any forms of modern slavery, including forced, bonded or compulsory labour, human trafficking or child labour. All work must be performed on a voluntary basis, and every employee shall be free to terminate their employment within reasonable time.

Business Partners shall pay employees wages and benefits that meet or exceed the legal minimum standards or minimum standards set out in collective bargaining agreements. Where a legal minimum wage does not exist, the wage should correspond to a living wage or, if higher, the norm for the local industry.

Business Partners shall ensure a safe and healthy work environment for its employees. Employees of the Business Partner shall not be subjected to mental or bodily harm in the workplace. At a minimum, Business Partners shall at all times comply with applicable work environment laws and regulations, including laws and regulations concerning workplace health and safety, working and resting hours, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.

Business Partners must respect the right of employees to join, or not to join, associations and unions of their own choosing and to bargain collectively, to express political views and engage in political activities outside of working hours – as permitted by applicable laws and regulations – without harassment, discrimination or retaliation.

3.3 Equal opportunity, fair treatment and non-discrimination

Employees of Business Partners shall be treated with dignity and respect and are to be provided equal opportunity. Discrimination or harassment based on ethnic, social or national origin, gender, sexual orientation, marital status, pregnancy, health, birth, parental or other status, religion, property, political or other opinion, nationality, skin colour, race, disability, age, union membership or other reasons relating to personal characteristics shall not be tolerated.

4. Climate and Environmental Sustainability

Business Partners shall recognise that environmental sustainability is an important factor in long term business success. Business Partners should work to address potential environmental issues and shall use resources and conduct business in

an environmentally responsible manner. Business Partners shall at all times comply with applicable environmental laws, regulations and standards.

Business Partners should strive to conduct their operations with the least possible negative impact on the environment. This includes looking for opportunities to reduce energy and fossil materials use, greenhouse gas emissions, and waste, and considering the environmental impact of business decisions.

Sourcing of raw materials shall always be conducted in a responsible manner for both humans and nature and in accordance with all applicable laws and regulations. For more information, see the ***Duni Group Wood Sourcing Directive***.

5. Anti-corruption and conflicts of interest

Duni Group does not tolerate any form of corruption and Business Partners must perform their operations in accordance with all applicable anti-corruption and anti-bribery laws and regulations. Without limiting the generality of the foregoing, Business Partners must not seek, accept, retain, offer, promise etc. business advantages based on illegal, improper, or unethical behaviour. An adequate management system for the prevention of corruption should be maintained.

Business Partners shall avoid situations in which personal interests, or the interests of family members, may affect the Business Partner's ability to make business decisions that are in the best interests of Duni Group or the Business Partner, in its relation with Duni Group.

6. Fair competition

Duni Group expects Business Partners to support the principles of fair competition and comply with all applicable laws and regulations designed to promote fair competition. Employees of Business Partners shall not engage in discussions with competitors regarding market allocation, information exchange, production and sales quotas, or bid rigging.

7. Trade compliance

Business Partners are required to comply with all applicable export control laws and regulations and all trade sanctions regulations. This includes, among other things, not to engage in any business involving any person or entity individually targeted under any economic sanctions or export control laws or regulations of the UN, US, EU, UK or any other relevant jurisdiction (a "Listed Person"), any entity directly or indirectly owned or otherwise controlled by one or more Listed Persons or conduct any business related to the applicable agreement between the parties in violation of sanctions or export control laws applicable to Duni Group.

8. Anti-money laundering

Business Partners shall carry out their financial activities in ethical, transparent and legal ways. All financial transactions shall be carried out in accordance with applicable laws and regulations and Business Partners shall under no circumstances be complicit in any activities of money laundering or financing of terrorism. In addition, to further prevent money laundering, the Group has adopted principles on due diligence, will not accept cash payments, will not make payments or return payments to other than to contracted business partners and will not make payments to countries other than the home country of the business partner.

9. Implementation, monitoring and enforcement

Business Partners shall ensure that relevant employees are aware of and understand this Code. Business Partners shall ensure that materially similar requirements as in this Code are cascaded to and complied with within its own operations and by its direct suppliers engaged in a Business Partner's work for Duni Group. Business Partners must ensure that every employee has the right to raise concerns about potential breaches of the Code without fear of reprisals through adequate reporting channels.

Duni Group reserves the right to request information and conduct audits of all Business Partners to ensure compliance with this Code, including conducting physical audits of sites or other facilities used by the Business Partners in their provision of services or goods to Duni Group.

If the Business Partner is prevented from complying with certain requirements of this Code or otherwise becomes aware of or suspects any violations of this Code, , in their own business or in that of any subcontractor or other partner of the Business Partner the Business Partners shall inform Duni Group without undue delay. Any violations of this Code, unless corrected within a reasonable period to the satisfaction of Duni Group, gives Duni Group the right to terminate the business relationship with a Business Partner and to terminate any agreement and/or cancel any outstanding orders.

Confirmation of read and understood Business Partner Code of Conduct

I hereby confirm that I have read the Business Partner Code of Conduct, it is clear to me, and I or my company shall act in accordance to it in my/our daily business with Duni Group.

Date _____

Signature and Full name _____

Title _____

Company _____