



# *CODE OF* CONDUCT

27-11-2025  
Version 2.0



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# *To Our Business Partners and Others for Whom It May Concern*

**Nordlux Group is committed to avoid and address adverse impacts on the basic principles for the social, environmental, and economic development that we cause, contribute, or are linked to in our business relations.**

Therefore, we seek to ensure that our own company, as well as our business partners, operate in accordance with requirements of the Nordlux Code of Conduct, and thereby work towards alignment with the internationally recognized principles for sustainable development.

We acknowledge that establishing the required processes outlined in our Code of Conduct requires both time and resources, especially in the initial phases. We are implementing and maintaining similar processes in our own internal operations. This Code of Conduct sets out clear expectations for cooperation and dialogue to continuously improve systems that prevent and address adverse impacts on human rights, including labour rights, environmental standards, and anti-corruption.

We focus on our business partners' ability and willingness to demonstrate continuous improvements in meeting the requirements of this Code of Conduct. We believe that cooperation and dialogue can lead to a more efficient and beneficial partnership for both parties.

Please refer to the enclosed Code of Conduct for more information about the specific requirements. If you have any questions regarding this letter, our Code of Conduct, or our responsible supply chain management program in general, please do not hesitate to contact our Compliance Officer<sup>1</sup>.

*Kind regards,*

**Nordlux**

<sup>1</sup>compliance@nordlux.com

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## Definition of the Term "Business Partner"

In this document, the term "Business Partner" is to be understood as the partnership between Nordlux and our suppliers and customers. It is a combination of two or more people who share responsibility for managing the activities that the partnership is generating.



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## Nordlux - Code of Conduct

Nordlux is a global market leader within the lighting industry. We believe that we have a natural obligation to take our part of the responsibility for the solution to national and global challenges.

We are lifting people's quality of life with light, and we are passionate about inspiring people to make the most of lighting. The Danish tradition and passion for great lighting combined with world class technology enables us to deliver a wide range of sustainable products with a superior combination of lasting quality, great design and user-friendly functionality - at competitive prices.

Nordlux's products light up the dark in countries all over the world and are sold by thousands of dealers worldwide. Our presence, worldwide, takes great value and support in the 17 UN Sustainable Development Goals<sup>2</sup> (SDG's).

**Nordlux have pointed out the three UN SDG's that perfectly suit our behaviours which are:**

- Integrity
- Dynamic
- Excitement
- Ambitious

**The pointed-out UN goals are the following:**



<sup>2</sup><https://sdgs.un.org/goals>

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# A Brighter World

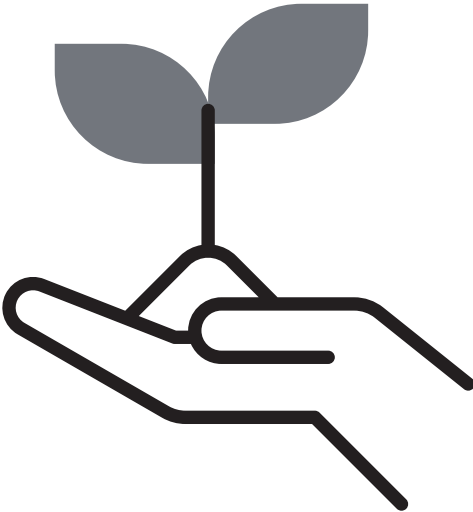
Our social responsibility efforts are gathered under the heading ‘A Brighter World’. This is an expression of taking our social responsibilities on human and labour rights as well as on how we want to focus on improving environmental conditions and seek to avoid corruption.

Within our membership in Amfori we set our values and principles and strive to implement these in our supply chain. Our code is also based on the values from the Amfori Code of Conduct, which acknowledges that international trade is an essential vehicle for human prosperity and social economic growth. We believe that this altogether leads to ‘a brighter world’. Likewise, we are proud holders of the FSC™ certification as a step towards becoming environmentally responsible in our product development.

The Amfori Code of Conduct refers to international conventions such as Universal Declaration of Human Rights<sup>3</sup>, the Children’s Rights and Business Principles<sup>4</sup>, UN Guiding Principles for Business and Human Rights<sup>5</sup>, OECD Guidelines<sup>6</sup>, and International Labour Organization<sup>7</sup> (ILO). Conventions and recommendations are relevant to improve working conditions in the supply chain.

We acknowledge that achieving a more sustainable profile is a task that involves everyone with a connection to Nordlux – from owners, board members and management to coworkers, suppliers, sub-suppliers and customers.

We are committed to establishing the required standards and processes and acknowledge that it requires both time and resources from us and our business partners. Most important is the willingness to demonstrate continuous improvements to meet the requirements in our Code of Conduct. We feel confident that transparent dialogue and cooperation can result in more sustainable and efficient partnerships from which both parties will benefit.



<sup>3</sup><https://www.un.org/en/about-us/universal-declaration-of-human-rights>  
<sup>4</sup><https://childrenandbusiness.org/>  
<sup>5</sup>[https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)  
<sup>6</sup><https://www.oecd.org/>  
<sup>7</sup><https://www.ilo.org/global/lang--en/index.htm>



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# Human Rights and Our Requirements

## Requirements to Our Due Diligence

At Nordlux, we see ourselves as a responsible company committed to continuous improvement. As stated in our vision, we are prioritizing a high level of integrity. Therefore, we are committed, via our business, to exercise due diligence and learn how to identify, prevent, and mitigate any adverse impact related to our Code of Conduct. This is required for all individuals, groups, and entities that our business has impact on within the trade, production, and the local community. The process of implementing company policies is the key to aligning due diligence through our supply chain.

The policies cover relevant impact areas such as health and safety and anti-corruption. Such policies must be communicated to all employees and other relevant stakeholders. Procedures and management systems are continuously developed to ensure that policies are implemented and adhered to.

## Freedom of Association and Collective Bargaining

All employees should have the right to freely associate and participate in collective bargaining. We respect and support these rights as fundamental to fair and transparent workplace practices. This is also expected by our business partners.

Our business partners shall achieve to:

- 1. Respect the right of workers to form unions democratically.**
- 2. Not discriminate against workers who are members of a trade union.**
- 3. Respect workers' right to bargain collectively.**
- 4. Not prevent workers' representatives from having access to workers in the workplace or from interacting with them.**
- 5. Respect this principle by allowing workers to freely elect their own representatives with whom the company can enter a dialogue about workplace issues.**

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# No Discrimination

Business partners shall achieve to not exclude, discriminate, or have a certain preference for persons based on gender, age, religion, race, maternity, disability, ethnic, nationality, membership in unions or any other legitimated organizations, political affiliation or opinions, sexual orientation, diseases, or any other condition that could give rise to discrimination. Particularly, workers shall not be harassed or disciplined on any of the grounds listed above.

# Fair Remuneration

Business partners must ensure that all workers receive fair remuneration sufficient to provide a decent standard of living for themselves and their families, including all legally mandated social benefits. Wages must, at a minimum, meet government-mandated minimum wage requirements or industry standards established through collective bargaining, whichever is higher.

Payments must be made fully, on time, and in legal tender. Partial payment in the form of allowances 'in kind' is only permitted in accordance with ILO standards. Deductions may occur solely as allowed by law or collective agreement and must never be used as a disciplinary measure.





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# Decent Working Hours and Working Conditions

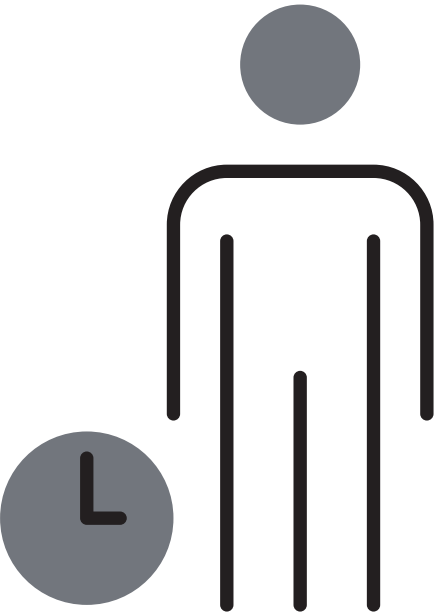
Business partners must ensure that workers do not work more than 48 regular hours per week, excluding overtime, and that overtime does not exceed 12 hours per week.

These limits reflect ILO standards for safe and sustainable working hours, while allowing flexibility for occasional peak workloads. Overtime must never increase occupational hazards or be requested regularly.

Workers must be granted daily rest breaks and at least one day off every seven days, unless exceptions are allowed under collective agreements. Business partners must provide all employees with a written, clear, and legally binding contract including date of birth, holidays, and working hours.

Employees' private life must be respected. Employers must provide access to medical or health-related assistance during working hours and ensure protection against mental, physical, or sexual harassment, abuse, threats, or disciplinary abuse in the workplace, whether by management or colleagues.

Under no circumstances shall an employee be required to work beyond the hours permitted by law.



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# Occupational Health and Safety

Business partners must respect workers’ and local communities’ right to healthy working and living conditions. Vulnerable individuals, including young workers, expecting mothers, and persons with disabilities, shall receive special protection to ensure legal compliance.

Business partners must comply with occupational health and safety regulations, or with international standards where domestic legislation is weak or poorly enforced.

The active cooperation between management and workers, and/or their representatives is essential to develop and implement systems towards ensuring a safe and healthy work environment. This should be possible to achieve through Committees of Occupational Health and Safety.

Business partners must have systems to identify and manage health and safety risks, and take effective measures to prevent accidents, injuries, and work-related illnesses.

Business partners shall seek to improve protection of the workers in case of accidents including through obligatory insurance schemes. Business partners must ensure the safety of equipment, buildings, and any worker accommodations, and protect against foreseeable emergencies. Workers’ right to leave premises in imminent danger without permission must be respected.

Business partners must provide adequate medical assistance, safe drinking water, clean eating and resting areas, and effective Personal Protective Equipment (PPE) free of charge. Workstations must be well-lit and ventilated.

Business partners must maintain a safety policy and documented procedures for hazardous work and emergencies. Workers must receive proper training and must not be disciplined for raising safety concerns.

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# No Child Labour and Protection of Young Workers

Business partners must not employ children below the minimum age for completing compulsory schooling, which shall be at least 15 years, unless exceptions recognized by the ILO apply. Policies against child labour must be established, and robust age-verification mechanisms implemented in a respectful manner.

If children are removed from the workplace, business partners should take measures to protect them and, where appropriate, support adult family members with access to decent work.

Young workers (aged 15–18) must be protected from hazardous work, night shifts, and any tasks that may harm their health, safety, or development. Working hours must not interfere with schooling or vocational training. Business partners must provide training, access to grievance mechanisms, and occupational health and safety protections, ensuring all legal limitations for young workers are observed.

# No Unsecure Employment

Business partners must ensure that employment relationships do not create insecurity or social and economic vulnerability for workers. All work must be performed under a recognized and documented employment relationship that complies with national legislation, customary practice, or international labour standards—whichever provides the greater protection.

Before starting employment, workers must receive clear information about their rights, responsibilities, and employment conditions, including working hours, remuneration, and terms of payment. This applies to all workers, including temporary, migrant, and seasonal workers.

Business partners must provide decent working conditions that support workers in their roles as parents or caregivers. Employment arrangements must reflect the genuine intent of the law and may not be used to circumvent worker protections. This includes, but is not limited to, apprenticeship schemes without real training, seasonal or contingent work used to undermine rights, and subcontracting that diminishes workers’ protections.

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## No Bonded Labour

Business partners will risk allegations of complicity if they benefit from the use of any form of bonded, forced, servitude, indentured, trafficked or non-voluntary labour. Therefore, business partners shall act with special diligence when engaging and recruiting migrant workers both directly and indirectly. Business partners shall allow their workers the right to leave work and freely terminate their employment, provided that workers give reasonable notice to the employer. Business partners shall ensure that workers are not subject to inhumane or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse. All disciplinary procedures must be established in writing and should be explained verbally to workers in clear and understandable terms.

Business partners must refrain from any use of forced labour and must ensure that all employees have free personal movement during their employment. Under no circumstances must the business partner deprive the employees of identity papers, passports, or other personal papers.



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# Ethical Business Behaviour/Anti-Corruption

Business partners observe this principle when, and without prejudice to the goals and expectations set out in this chapter, they are not involved in any act of corruption, extortion, or embezzlement, nor in any form of bribery - including but not limited to - the promising, offering, giving, or accepting of any improper monetary or other incentive.

Business partners are expected to act according to high ethical standards and with integrity in all matters related to their business and have adequate procedures to prevent corruption in their operations. The business partner must develop its ethical business practices to comply with the policy objectives as described in the areas below:

**A. Sensitive transactions**

It is the policy to prohibit employees from entering sensitive transactions and business dealings generally considered to be either illegal, immoral, unethical or to reflect adversely on the integrity of the business and its commercial partnership with us. These transactions usually come in the form of bribes, kickbacks, gifts of significant value or payoffs made to favourably influence some decision affecting a company's business or for the personal gain of an individual.

**B. Accounting controls, procedures and records**

The business partner keeps accurate records of all transactions, and the disposition of its assets as required by law and maintains a system of internal accounting controls to ensure the reliability and adequacy of its books and records. They ensure that only transactions with proper management approval are accounted for by its records.



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# Requirements to our Product Suppliers regarding Protection of the Environment

Business partners should assess significant environmental impact of operations and establish effective policies and procedures that reflect their environmental responsibility. They will arrange adequate measures to prevent or minimise adverse effects on the community, resources of the nature and the environment.

Business partners must strive to use less possible resources in the production and hereby also strive to reduce carbon footprint in transportation. Business partners must, at all times, improve on following areas:

- 1. Mass production.**
- 2. Limit waste used in general for both products and packaging. For packaging, plastic should be avoided where possible.**
- 3. Products must comply with the updated REACH, RoHS and other relevant EU requirements.**
- 4. Our suppliers are required to stay updated on the list of Substances of Very High Concern (SVHC) and avoid the use of SVHC. If any are used, it needs to be communicated to us by e-mail including the amount to secure that the limit value is not exceeded.**
- 5. Prioritise using the most sustainable materials.**
- 6. When using wood in the products it should always be FSC™ certified.**
- 7. Avoid use of Styrofoam in packaging.**
- 8. Use the most sustainable transportation possible.**

By "end of life" for packaging and products, we want to enable responsible recycling by reducing the different materials used in packaging. The business partner must demonstrate willingness to continuous improvements of the overall environmental performance related to areas listed above.

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## Product Responsibility and Quality

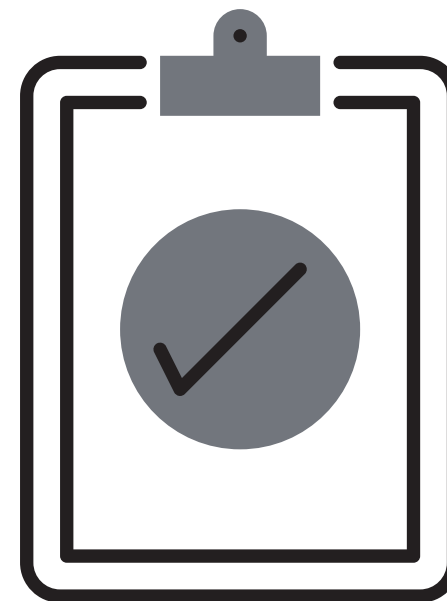
The business partners shall exercise due diligence when designing, manufacturing, and testing products so that product defects that could be harmful to people's health or the environment are avoided. These actions, seeking to use the most responsible choices regarding resources throughout our value chain, will contribute to lowering the environmental impacts of our business – and ensure competitive products.

At the same time, we are prioritising the quality as we want to produce products that are made-to-last. This way the products will remain in service for many years and thereby also reduce the impact on the environment.

The business partner must strive to minimise the adverse environmental impact of its activities and comply with all applicable environmental laws and regulations, as stated in bullet points in previous section. In regards of product responsibility, the business partners must focus on:

- 1. Compact/flat packing.**
- 2. Limit accessories included with the product.**
- 3. Quality assurance/QC.**
- 4. Modular and standard components.**
- 5. Highest possible Ra value for improving the quality of light.**

The business partner must demonstrate willingness to continuous improvements of the overall shared product responsibility and quality performance.



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# Whistleblower/Grievance Mechanism

Business partners must arrange to have a whistleblower mechanism in place allowing stakeholders to voice their concern if they find that operations of the business partner are adversely affecting human and labour rights, environment, including climate, and anti-corruption.

The whistleblower mechanism should be widely communicated and accessible to all workers. This also includes temporary workers. It should be managed in a confidential, unbiased, timely, and transparent manner, and should be appropriate to the size of the company and can take the form of a whistleblower function, worker representation committee, etc.



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# Requirements for Our Due Diligence

Suppliers shall sign the contract and once a year complete a self-assessment before receiving a social audit mission from Nordlux.

Through open and transparent dialogue of this Code of Conduct we believe that our relationship with our business partners can evolve during the process of due diligence.

Business partners are expected to inform sub-contractors of the Code of Conduct, and any hidden factories are not accepted. All our business partners are evaluated against the Code of Conduct, and we prioritise business partners who are committed to demonstrating compliance and continued improvements. Likewise, business partners are evaluated through different types of assessment, including self-assessments, internal assessments, and third-party assessments (announced and unannounced).

We and the appointed third-party auditors must be granted access to all facilities, including sub-contractors, as well as relevant documentation and employees as requested.

We trust that our business partners will embrace the requirements of this Code of Conduct. In cases where a business partner needs to improve certain procedures and practices, they must be committed to do so, within a specific timeframe. We believe that achieving good social and environmental standards is a process, and we are committed to working together with our partners in their efforts. If a business partner demonstrates lack of willingness and commitment to engage and improve on standards of the Code of Conduct, throughout a predetermined period, Nordlux will consider terminating the partnership.

CEO, Niels Jakobsen, Nordlux Group

Business Partner to Nordlux Group

\_\_\_\_\_

\_\_\_\_\_

*Date, stamp and signature*

*Date, stamp and signature*

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