

Supplier Code of Conduct

Commitment

LOWENCO is committed to responsible business conduct.

To LOWENCO this means seeking to minimize the environmental footprint of our innovative solutions and services through high awareness of environment, circularity, health and safety and information security based on the following internationally recognized standards:

- The United Nations' Global Compact, derived from:
 - The Universal Declaration of Human Rights
 - The International Labor Organization's Declaration on Fundamental Principles and Rights at Work
 - The United Nations Convention Against Corruption
 - The Rio Declaration on Environment and Development.
- UN Guiding Principles for Business and Human Rights
- OECD Multinational Enterprise guidelines
- Instructions in the Danish Agency for Digital Government's requirements catalogue
- UN's Sustainable Development Goals of which LOWENCO has chosen to pursue goal 3, 7, 11, 12 and 16.
- UN Climate Convention UNFCCC, limiting greenhouse gas emissions via Science Based Target initiative.

Expectations

This supplier Code of Conduct (CoC) is a set of ethical and moral rules which we expect our employees and suppliers to comply with. Working all over the world, we face dilemmas and challenges every day, and the CoC will support you and us during the daily activities in making informed decisions.

At LOWENCO, we firmly believe that we should take care of the world around us, which includes society in general, beyond the requirements and regulation. Our employees are educated and trained in being compliant with the CoC. The CoC applies in all countries in which we do business. In cases where national law is stricter, national law takes precedence.

Through this CoC, LOWENCO wish to ensure that products are manufactured in a responsible way. We aim to establish long lasting relationships with our suppliers to our mutual benefit. It is the intention to encourage commitment to responsible manufacturing.

Customer satisfaction and consideration for information security, health, safety and environment impact is our main focus when designing and manufacturing freezer solutions to the pharma- and biotech industry with: **LOW ENERGY COOLING**

LOWENCO respects the culture, customs, and traditions of the countries in which we operate. LOWENCO expect suppliers to share this respect and our commitment to the mentioned internationally recognized standards.

Suppliers to LOWENCO are expected to act in accordance with national and international legislation and regulation. Suppliers shall communicate this Code to their Sub-Suppliers, thus extending the standards throughout their entire supply chain.

Suppliers are expected to use their best efforts to integrate the standards of this code into their business and operations and are encouraged to contact LOWENCO for advice if needed.

Information security

Information security and compliance with the General Data Protection Regulation (GDPR) are fundamental to protecting our business and our partners. To ensure the security of both product and personal data, LOWENCO implements systematic controls and handles documentation in accordance with established policies. This includes secure storage, preservation, and management of all relevant data. All employees are required to complete mandatory training and testing to ensure awareness and preparedness. LOWENCO is certified according to DS/EN ISO 27001:2022, reflecting our commitment to the highest standards in information security.

Human Rights, labor rights and freedom of association

In respect of human and labor rights the specific principles of this CoC are based on the eight core conventions defined in the ILO Declaration on the Fundamental Principles of Right to Work.

We expect our suppliers to adhere to FN Global Compact and maintain high standards in taking care of their employees and the environment in which they work.

LOWENCO respects the fact that not only Governments can ensure that Human Rights are upheld. The recognition of our responsibility in respecting and acknowledging that remediation must be provided if LOWENCO business leads to violation of Human Rights. LOWENCO expects its suppliers to respect FN Global Compact and its Ten Principles, as well as recognizing that remediation must be provided in case of breaches to the Ten Principles.

Employees must have freedom of association and the right to collective bargaining consistent with applicable law.

Employees must have the right to join or not to join a union.

Managers, supervisors and guards must be trained in respecting employees to associate freely.

Forced or Child Labor

The use of child labor will not be tolerated. The minimum age for employment shall be in accordance with the ILO Convention or the age specified by local legislation, if higher. We expect the supplier to take full responsibility and ensure that light work for a few hours a week provided, is not likely to neither be harmful to their physical or mental health and development nor prejudice attendance at school.

Non-Discrimination and harassment

LOWENCO recognize diversity as a strength. Discrimination against or harassment of any of the supplier's employees in regard to race, ethnic background, gender, disability, sexual orientation, religion, political opinion, maternity, social origin or any similar characteristics is prohibited. Physical, psychological, sexual or verbal harassment or any illegal threats made against or between any colleagues or business partner will not be tolerated.

Health and safety

All suppliers to LOWENCO must provide a clean, safe, and healthy working environment for all employees.

- Workers must not be exposed to dangerous work without being properly protected.
- Workers are instructed in the use of Personal Protective Equipment and usage must be enforced.
- Facility management should support the formation of a workers' Health and Safety committee.
- Facilities must ensure that there are adequate fire alarms and extinguishers and clear instructions on evacuation and the use of fire equipment and that they are in compliance with laws and regulations.
- Hazardous materials must be stored correctly and in a safe and maintained space and used by trained personnel only.
- Machinery must be shielded and properly maintained.

Prevention of injuries

A thorough risk assessment must be conducted to ensure that employees do not work in a dangerous environment. If any high-risk areas are found and unable to be eliminated the supplier must supply personal protection equipment and risk areas must be clearly signed.

There must at all times be sufficient employees trained in first aid and first aid equipment for them to use.

Environmental impacts

LOWENCO encourages its suppliers to think environmentally friendly and recycle as much as possible. LOWENCO pursues FN's Sustainable Development Goal no. 3, 7, 11, 12 and 16. LOWENCO therefore expects that supplier implements policies and procedures on environmentally friendly initiative to prevent the occurrence of harm to environment, natural resources, and local communities. These policies shall aim to ensure sustainable consumption and production patterns and to combat climate change and its impacts. All local and national laws and regulations must be ratified. LOWENCO expects the supplier to make an environmental management plan that should help minimize the effects on the environment from business activities, reduce energy consumption and greenhouse gas footprint.

Water

LOWENCO recognizes the need to take care of the world's water supplies, therefore, LOWENCO expects its supplier to consider their water usage and have an action plan for the reduction of water and recycling of the same. All water must be disposed of according to laws and regulations.

Waste

LOWENCO expects its suppliers to have a waste management plan. The supplier should sort their waste to better be able to recycle or dispose the waste in a non-harmful way to the environment.

Ethics

LOWENCO expects its suppliers to always conduct themselves in an ethical and morally correct way. This includes the treatment of own employees, LOWENCO employees, Sub-Suppliers to LOWENCO and the local population.

LOWENCO pursues FN's Sustainable Development Goal no. 16. LOWENCO therefore expects supplier to show an ethical behavior and promote peace, justice, and strong institutions.

Corruption and Bribery

LOWENCO does not accept bribery or attempts of bribery, corruption, extortion, or embezzlement. Should a supplier be found to be using or accepting bribery, corruption, extortion, or embezzlement the partnership between LOWENCO and the supplier will be reconsidered and may be terminated. This includes the promising, offering, giving, or accepting of any improper monetary benefits or other incentives.

Grievance and Discipline

LOWENCO invites its suppliers to contact LOWENCO if any cases of policy breaches or misconduct that may concern LOWENCO are found.

Please, report irregularities direct at: info@lowenco.com or if confidentially in LOWENCO's whistle blower system through the following link: www.report.whistleb.com/en/lowenco
(Language could be changed from English to Danish).

LOWENCO reserves the right to contact the suppliers' management or HR department if any problems are found with the supplier or any of its employees.

LOWENCO does not accept the use of physical or psychological punishment or threats thereof.

Monitoring

Suppliers are expected to vouch for their subcontractors' compliance as well as for their own employees' compliance with the principles of this CoC.

LOWENCO reserves the right to monitor suppliers and their facilities to ensure compliance with this CoC. LOWENCO can request adequate action plans to correct monitoring findings and undertake follow up visits to ensure that improvements are made. If improvements do not progress in an acceptable manner LOWENCO reserves the right to terminate the relationship.

To ensure that suppliers contribute to reducing climate impact, LOWENCO conducts annual surveys to evaluate whether they are progressing in the desired direction. Suppliers without a documented sustainability program are encouraged to adopt EcoVadis, a platform that enables transparency and measurable progress. This approach allows LOWENCO to monitor supplier development, engage with stakeholders, and support long-term collaboration.

Responsibility

Executives and senior management are held accountable for compliance with this Code of Conduct.

This Code of Conduct Policy is approved by:

Company
Name
Titel
Date
Signature

This document is:

Reviewed when needed or at least annually.

Approved the 22MAY2025

Hereby signed of LOWENCO's CSCo:

Stefan Hørlyck

