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GEMINOR

Geminor: Code of Conduct

Introduction

At Geminor we constantly strive to create and maintain a safe and equitable working environment for our employees and our sub-contractors. Through this Code of Conduct, we are working to ensure that sustainable working practices are embraced within the business and in decisions made across our value chain. To communicate these expectations and our corporate social responsibility to our employees and business partners, we have created a set of ethical guidelines.

It is a requirement that all employees, sub-contractors, suppliers and their sub-contractors conform to the guidelines outlined below.

Compliance with the code and applicable law

The business of Geminor shall be carried out in accordance with applicable laws and regulations, this Code of Conduct, internal guidelines and procedures. Where national laws and regulations cover the same topic as these guidelines, the highest standard shall apply.

This Code of Conduct include our most important requirements, provides references to more detailed requirements in our governing documents. All policies referred to in this Code of Conduct can be found in our Quality Management System.

We expect all employees and contractors to make themselves familiar with the Code of Conduct as well as other governing documents and applicable laws relevant to their work and operations.

Geminor expects all employees to take responsibility for monitoring compliance with the Code of Conduct within the scope of its work. We also require our suppliers to do the same. Concerns of non-compliance with the code is expected to be reported in line with the principles set out in Geminor's Whistle Blowing Policy.

The Code of Conduct applies to everyone working for or representing Geminor in any form, irrespective of the nature of the contract the relation is based on. This includes, but is not limited to, directors, employees, as well as hired contractors. The Code also applies within our subsidiaries. The requirements in this Code of Conduct shall be implemented in all company agreements with suppliers and partners.

Health, Safety and Working Environment

Geminor commit to eliminating any hazards and to reduce health and safety risks identified within the scope of our day-to-day operations. At Geminor, we actively promote an open attitude to health and safety issues and encourage all staff to identify and record accidents, near-misses, and incidents with our management system as laid out in our Policy on Quality. Transparency within Geminor between management and employees ensures that each employee recognizes their responsibility to record risks with regards to health, safety, and the working environment, and that the Management Team commit to minimizing and eliminating these risks where possible with risk assessments, regular auditing and operational procedures.

This means that Geminor will always screen our business partners, suppliers and other parties against relevant restricted parties' lists before entering into any business with them, as well as



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obtaining and complying with necessary governmental licenses where cross border export or import activity involves restricted items, technology or software.

Anti-corruption and bribery

Geminor and our partners condemn all forms of corruption and bribery. It is our policy to conduct all business in an honest and ethical manner and take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all of our business activities. Our policies are clearly outlined in our detailed Anti-bribery and corruption Policy and all suppliers must be prepared to provide documentation showing that these guidelines are being followed.

Anti-money laundering

Geminor is opposed to all forms of money laundering, and will comply with all applicable anti-money laundering and anti-terrorism laws. We will also take steps to prevent our financial transactions from being exploited by others to launder money.

Human Rights

Geminor respects and promotes internationally recognized human rights. We will conduct our business consistently with the United Nations Guiding Principles on Business and Human Rights, The European Convention on Human Rights and the United Nations Convention on the Rights of the Child. We also consider the conventions of the International Labour Organization (ILO Conventions). No exceptions are permitted, irrespective of any reason at any time.

Geminor supports and respects internationally recognized labor rights, including the freedom of association and the right to collective bargaining within national laws and regulations. Geminor condemn all forms of human trafficking and child labor abuse and shall not employ or contract any forced or compulsory labor. Forced labour refers to bonded labour, other forms of slavery, work performed by prisoners, penal labour or human trafficking. All employees must be able to move freely during their employment and must be free to leave after dismissal in accordance with their signed contract. Retention of passport and identity documents, and threats of denunciation to the authorities is strictly prohibited.

Trade regulations and sanctions

Geminor shall comply with all export, import, transit and trade laws applicable to Geminor's business. Furthermore, Geminor shall comply with all economic sanctions targeting specific countries, economic sectors, entities, individuals of concern etc.

Fair competition

Geminor shall comply with applicable competition and antitrust laws, and will not engage in or accept that suppliers or business partners engages in anti-competitive behaviour, such as market sharing, abuse of market power, bid rigging og price fixing.

Equality, Diversity, and Inclusivity

Geminor is committed to a policy of equal treatment of all members of the company and job applicants, regardless of race, gender, sexual orientation, disability, age, religion or belief. Geminor



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is constantly striving to ensure that there is no discrimination in employment as detailed in its Equality Policy.

Environment

Geminor is constantly striving to improve the sustainability of its operations across its value chain. Geminor is currently committed to seven of the United Nations Sustainability Development Goals (SDG) related to green growth and circular economy (SDG 8,11,13), environmentally sound solutions (SDG 7,12,13,14,15) and being a positive contributor to people and communities (SDG 8,12). Geminor publishes an annual sustainability report which details its progress and ongoing commitment to providing sustainable solutions in the waste to recycling and recovery market. Certain certifications are necessary to operate responsibly and also allow Geminor to offer some of the most sustainable solutions to waste recovery and recycling on the market. Specific certifications are detailed in relevant contracts, and it is the expectation of Geminor that all signees recognize their role in compliance.

Suppliers must ensure that all of their employees and its subcontractors meet the applicable environmental requirements and provide employees and subcontractors with adequate training to follow this up.

Service in connection with the export and import of waste shall be in accordance with the prevailing regulations, including the Basel Convention, EU rules on cross-border waste shipments as well as recipient countries' own legislation, and in such a way that attention to health, safety, environment and security are safeguarded.

Drugs and alcohol

Geminor is a drug-free workspace. Being under the influence of alcohol or drugs can create an unsafe work environment and is not tolerated.

Alcohol consumption is never permitted when operating machinery, driving or when on-site. Moderate amounts of alcohol may however be consumed at work related events when appropriate, setting and occasion taken into account.

Inform your manger if you are undergoing medical treatment with prescribed drugs which have the potential to impair behaviour or work performance.

Personal data and privacy

Geminor is committed to protecting the privacy of our employees and everyone with whom we do business. All personal data is processed securely using appropriate technical and organisational measures. Personal data includes employee, customer and business partner information such as phone numbers, e-mails, addresses, locations, call and payment history, salaries and health information.

Our standards

- We collect only personal data that is necessary for a legitimate purpose
- We keep personal data only for as long as is necessary



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- We implement technical and operational measures to ensure the security and integrity of personal data
- We classify all personal data as corporate-confidential

Your responsibilities

- Respect everyone's right to privacy
- Only collect data that is necessary to perform your work
- Adhere to the highest standards of confidentiality when using personal data
- Familiarise yourself with internal requirements on handling personal data
- Keep your personal emails and documents separate from work material on Geminor computers

Consequences of breach

Potential misconduct may be investigated, either by internal or external recourses. We will pursue remedial measures if you breach the Code of Conduct or applicable laws. Such remedial measures may involve termination of employment or contract, as well as potential legal proceedings and/or reporting to relevant authorities. The same applies to leaders who disregard or tolerate such breaches either through negligence or actual knowledge.

