

Code of Conduct for NLM Vantinge

*Approved by Management
Subject to yearly review. Updated January 2025*

Introduction

NLM Vantage Group ApS (“NLM Vantage”) and its daughter companies are committed to conducting business in a responsible, ethical, and sustainable manner. This Code of Conduct serves as a guide for our employees, suppliers, and business partners, ensuring that we operate with integrity and respect for human rights, labor standards, environmental protection, and anti-corruption principles.

This Code of Conduct outlines how we do business and the standards we expect from our employees, partners and suppliers.

Scope

This Code applies to all employees, business units, partners and suppliers of NLM Vantage. Everyone covered by this Code is expected to adhere to the highest standards of integrity and accountability in all business activities. The principles of this Code are based on internationally recognized standards, including the United Nations Global Compact’s 10 Principles.

General Principles

NLM Vantage's reputation and credibility are directly influenced by the behavior of our employees and partners. We expect all stakeholders to:

- Uphold integrity and responsibility in all matters
- Act in the best interest of NLM Vantage
- Comply with all applicable laws, regulations, and internal policies

Violation of this Code of Conduct may ultimately lead to dismissal.

Business Conduct

All business activities carried out by NLM Vantage and its partners must comply with the following principles:

- **Legal Compliance:** All business operations must be conducted in accordance with the laws and regulations applicable in the countries where we operate
- **Anti-Corruption:** Bribery, extortion, and other forms of corruption are strictly prohibited (please also refer to our Anti-Bribery, Anti-Corruption, and Anti-Money Laundering Policy and Procedure)
- **Confidentiality:** Employees and partners must maintain discretion and confidentiality when handling sensitive information
- **Conflict of Interest:** Employees and partners must avoid any actions or relationships that could lead to conflicts of interest

Workplace Environment

NLM Vantinge is committed to fostering a positive, safe, and motivating work environment:

- **Safety:** All employees are expected to take responsibility for maintaining a safe workplace by adhering to safety standards and actively participating in improving workplace safety
- **Drugs and Alcohol:** It is strictly forbidden to be under the influence of drugs or alcohol at the premises of NLM Vantinge. At company events, the CEO can permit alcohol consumption in moderation.
- **Equal Opportunity:** Discrimination or harassment based on gender, race, religion, nationality, disability, age, or sexual orientation is not tolerated
- **Personal Development:** We support personal and professional growth, ensuring that employees have opportunities to develop their skills and thrive within the company

Human Rights

We respect and uphold the internationally recognized human rights of all individuals and are committed to:

- **Prohibiting forced labor and child labor:** Forced labor and child labor are strictly prohibited. Suppliers must ensure that no individual under the legal working age is employed
- **Fair Wages and Working Conditions:** Wages, working hours, and conditions must comply with national laws and industry standards
- **Freedom of Association:** Employees have the right to freely join or form labor unions

Environmental Responsibility

NLM Vantinge is committed to minimizing the environmental impact of our operations. We expect our employees, suppliers, and partners to:

- **Comply with Environmental Laws:** All activities must comply with national and international environmental regulations
- **Improve Sustainability:** Continuously seek ways to reduce waste, conserve resources, and improve energy efficiency
- **Avoid Harmful Practices:** Avoid production methods or materials that may harm the environment

Supplier Standards

Suppliers to NLM Vantinge are chosen based on fair, transparent, and professional criteria. We expect suppliers to:

- Uphold the same ethical, social, and environmental standards as NLM Vantinge
- Ensure compliance with this Code of Conduct throughout their organization
- Be subject to periodic evaluation based on their performance in areas such as quality, human rights, and environmental responsibility

Implementation and Accountability

The management of NLM Vantinge is responsible for implementing and ensuring compliance with this Code of Conduct. All employees, suppliers, and partners are required to familiarize themselves with the contents of this Code and adhere to its principles. Any violation of this Code may result in disciplinary actions, including termination of employment or contracts.

Amendments

This Code of Conduct may be updated from time to time to reflect changes in laws, regulations, or NLM Vantinge policies.