Code of Conduct

Approved by Management
Subject to yearly review. Updated November 2026

INTRODUCTION

Enwerdi Group Holding ApS ("Enwerdi") and its subsidiaries 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 Enwerdi. 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

Enwerdi'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
- As employees, act in the best interest of Enwerdi
- Comply with all applicable laws, regulations, and internal policies

BUSINESS CONDUCT

All business activities carried out by Enwerdi 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 Procedures, which also sets out our rules on gifts and hospitality, conflicts of interest and sanctions)
- **Fair Competition:** We compete fairly and comply with competition law. Prices, capacities, customers or other commercially sensitive information must never be agreed or exchanged with competitors
- **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

Enwerdi 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 Enwerdi. Moderate consumption of alcohol is permitted at company events approved by management
- **Equal Opportunity:** Discrimination or harassment based on gender, race, religion, nationality, disability, age, or sexual orientation is not tolerated
- **Harassment:** Sexual harassment and other offensive behaviour – including unwanted physical contact, comments, jokes, messages or images of a sexual nature – are not tolerated, whether at work, at company events or in contact with business partners. If you experience or witness such behaviour, report it to your manager or as described under Speak Up. Reports are handled confidentially, and no one will face retaliation for reporting in good faith
- **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

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

- Uphold the same ethical, social, and environmental standards as Enwerdi
- Ensure compliance with this Code of Conduct throughout their organization

- Accept that Enwerdi may evaluate their performance in areas such as quality, human rights, and environmental responsibility

SPEAK UP

If you experience, or suspect, breaches of this Code of Conduct, the Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy and Procedures or other Company policies, you are expected to speak up by contacting the CFO or CEO. If your concern involves the CFO and/or the CEO, you are expected to contact our Chair of the Board of Directors, Anne Arhnung, directly by e-mail: arhnunganne@gmail.com. Enwerdi does not tolerate retaliation against anyone who raises a concern in good faith.

IMPLEMENTATION AND ACCOUNTABILITY

The management of Enwerdi 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 Enwerdi policies.
Version history: Version 2.0, November 2026 – added Speak Up section, fair competition and harassment; aligned with the ABCML Policy and Procedures; clarified alcohol and supplier evaluation; updated contact details. Previous version: April 2026.