

# Code of conduct

## NORDIC WOOD INDUSTRIES



## THE MARKET

### Who Are We?

Nordic Wood Industries is one of the leading manufacturers and providers in Denmark of wood-based materials and prefabricated products for sustainable construction projects in Denmark and selected Northern European countries.

The Nordic Wood Industries Group includes the following companies: Palsgaard Spær, Nviro, Lilleheden, Roust Element, Roust Spær, Scandi Byg, Bisco Binder, and Skandach Holzindustrie, and our current ten locations in Denmark and internationally have more than 700 employees in total.

The objective of the Group is to make it easy for construction industry players to opt for CO2 saving construction materials by partnering with industry relevant companies.

### Why This Code of Conduct?

The purpose of this Code of Conduct is to clarify the values and guidelines of Nordic Wood Industries. All employees are required to follow these guidelines to ensure we have a great place of work and to make our values visible to both subcontractors and business partners.

It is essential to us to ensure a great place of work and sound working conditions so all employees will feel safe and well treated.

### How To Use a Code of Conduct

At all times, you may find the Nordic Wood Industries Code of Conduct at our website, [nowi.dk](http://nowi.dk), as well as the websites of the individual companies if you want to learn more about the values and guidelines of the Group.

This Code of Conduct applies to all employees, business partners, and suppliers who are required to accept it.

### Whistleblower Program – Be Heard!

To Nordic Wood Industries, securing a good working environment is particularly important. Consequently, we have established a Whistleblower Program for all Nordic Wood Industries companies to ensure access to a safe space where all employee may report offenses or other irregularities. The process will be confidential and anonymous.

If an employee feels challenged at work, they are encouraged to reach out to their immediate supervisor or use the Whistleblower Program.

### Portal with reporting channel for Nordic Wood Industries and all companies under:

Nordic Wood Industries: <https://NOWI.indberet.nu>  
Nviro: <https://Nviro.indberet.nu>  
Lilleheden: <https://Lilleheden.indberet.nu>  
Roust: <https://Roustelement.indberet.nu>  
Palsgaard Spær: <https://palsgaardspaer.indberet.nu>  
Scandi Byg: <https://scandibyg.indberet.nu>

### Communication and Marketing

- All employees have a duty to protect sensitive personal data – on customers, business partners, and fellow employees.
- Nordic Wood Industries checks if our marketing activities are in accordance with the rules of good marketing practices, cf. the Act on Marketing.
- All inquiries from reporters will be processed by the individuals in charge of communication and marketing and only employees with relevant permissions may speak on behalf of the companies – including on social media or other digital platforms of the companies.
- Employees may not participate in SoMe discussions on behalf of the companies unless they have specific authorization to do so.
- Employees may not discuss sensitive or confidential information on public or social media while at work.

### Product Quality

- To all Nordic Wood Industries companies, quality is a major focus area. At all times, we strive to deliver the best possible quality to our customers.
- Nordic Wood Industries will accept responsibility should a customer not receive the agreed product or solution. In such cases, we assist the customer and ensure delivery of the agreed end result.
- Nordic Wood Industries supports sustainable forest management and we strive to ensure as much certified lumber to this effect as possible.
- Production units conduct quality controls prior to delivering their products to ensure the best possible end result for the customer.

### Financial Reporting and Security

- Bookkeeping and accounting materials are stored in a prudent manner in accordance with applicable laws, rules, and regulations.
- Nordic Wood Industries has implemented processes and administrative procedures to ensure the completeness and accuracy of accounting records and our financial reporting.
- IT security and data protection are high priority areas in order to ensure a secure environment for the Group and the companies under the Nordic Wood Industries umbrella.
- We always seek to maintaining a high level of IT security to protect the data of the Group.
- At all times, all Nordic Wood Industries companies are required to follow the applicable rules and regulations – also within data security and sensitive personal data (GDPR.) The necessary precautions to ensure compliance with the rules and regulations have been implemented.

### Conflicts of Interest

- All Nordic Wood Industries decisions should be taken in the best interest of the Group and the individual companies.
- No decisions should be based on personal matters and/or for the purpose of personal gain.
- Situations where personal interests could interfere with the interests of the Group should be avoided.
- Nordic Wood Industries has specific guidelines regarding the sale of products and solutions to the families of our employees in order to ensure legal and proper sales.

### Anti-corruption

- Nordic Wood Industries does not tolerate bribery or corruption in any form.
- The Group combats any and all forms of inappropriate or unacceptable actions, internally and externally.
- Nordic Wood Industries and the companies within the Group will intervene and handle any and all breaches of the law and our principles.
- All subcontractors and business partners are required to accept this Code of Conduct and to observe the same principles as the Nordic Wood Industries employees.



# THE WORKPLACE

## Good Working Conditions

- At Nordic Wood Industries, all employees are entitled to flexible working hours to enable a sound work / leisure time balance.
- A cooperation and working environment committee has been established at companies with production units. These committees follow the guidelines from the Danish Working Environment Authority as their fundamental norm and implement additional measures as required. Employees from both offices and production units sit on the committees.
- Special measures will be implemented for all companies in connection with pandemics, conflicts, war, disasters, supply issues, etc. Under such circumstances, the general safety and well-being of all employees will be key.
- We prioritize the general well-being and health of all employees

## Equality and Respect

- Discrimination based on skin color, gender, age, nationality, religion, pregnancy, sexual orientation, disabilities, or serious disease will not be tolerated. All employees should be made to feel accepted in all social and professional contexts under the Group umbrella of companies.
- Nordic Wood Industries supports supplementary training for all employees and job advancement opportunities for all genders, in the individual companies and in the Group.
- No forms of threatening, intimidating, sexual, or verbal harassment will be tolerated, and all employees are required to show respect for one another and in relation to customers, suppliers, and business partners.
- In connection with recruitments, the qualifications of the applicants should always be the decisive factor and never their skin color, gender, nationality, etc.
- Nordic Wood Industries wants to support all employees with regard to relevant supplementary training or courses as needed.
- All contracts of employment are similar for all genders and the only differences allowed are differences based on the position and duties in question.

## Safe Workplace

- On a current bases, the individual companies work to develop their safety procedures and we follow the regulations and guidelines of the Working Environment Authority.
- The goal is to establish a safe working environment for all employees. The production companies are particularly focused on safety where manual or mechanical work results in an increased risk of accidents.
- Companies with production units have one or more safety representatives and their cooperation and working environment committees convene in accordance with the Working Environment Act provisions. In general and on a monthly basis, the manager and a working environment representative conduct safety inspection rounds and also in connection with unintentional events.
- All production employees are required to wear mandatory and relevant safety gear and to follow the Working Environment Authority safety requirements.
- Employees including those spending most of their workday in vehicles are required to follow the Traffic Act provisions, pay attention to traffic safety, be responsible drivers, and to observe all other traffic safety practices.

## Certified Raw Materials

- All Nordic Wood Industries companies have a PEFC or a FSC certification enabling them to document full traceability for purchased certified lumber, thereby contributing to supporting sustainable forest management on a global basis.
- All companies with production units are audited on an annual basis to maintain their certifications. An internal quality system has been established where lumber purchased and its certifications are recorded.
- All recordings relating to PEFC or FSC will be accessible in digital form at least five years.
- The structural lumber we purchase carries the CE marking.

# SOCIETY

## Carbon Reporting

- To Nordic Wood Industries, sustainable development and reduction of our carbon footprint are very important. Every year, we prepare a carbon index for all our companies in order to illuminate our CO2 emissions from one year to the next. The carbon index is based on the GHG protocol, a leading standard for carbon footprint calculations.
- We constantly strive to implement CO2 reducing measures.
- We currently assess how Nordic Wood Industries solutions may be included in sustainable projects and fulfill the applicable certification program criteria in the best possible way.
- We work to enhance our Group solutions to make them even more advantageous on a total economy basis.
- We work targeted to convert the use of the industry of environmentally burdensome materials to the use of more wood in construction. We know that this effort will have the highest possible positive effect on the total climate load of the industry.

## Responsible Supply Chain

- By focusing on planning and efficient means of transport, logistics is under control and we make sure to optimize trucks to transport as many goods as possible simultaneously.
- We currently work to minimize transport to and from customers as well as from suppliers to Nordic Wood Industries companies.
- We prioritize ensuring knowledge and training for our employee on how to secure sustainable production and consumption.

## Reuse and Recycling

- We prioritize a high coefficient of utilization for all our resources. This is ensured already at an early planning stage for all production runs.
- At Nordic Wood Industries, we strive to reuse waste from all production processes for other products or purposes. We intend to currently assessing the possibilities presented to us with a view to further reusing waste products from all Group production activities.
- We strive towards reselling surplus lumber that cannot be reused by our production units or utilizing it in our own thermal plants and/or shipping it to local district heating plants for it to be used for residential heating purposes or similar.
- As it is important to us to promote the use of recycled products, among other things, our range includes insulation solutions based on recycled newspapers and wastepaper.
- All Nordic Wood Industries materials and solutions comply with applicable Danish and EU requirements for dangerous substances. No Group company solutions release dangerous chemicals to the indoor environment which could be potentially harmful to the persons using such facilities.

