

# Code of Conduct

## ET Europe ApS

This Code of Conduct establishes the ethical standards and behaviors that **ET Europe ApS ("ET")** expects to be upheld throughout its supply chain. It is applicable to all suppliers and subcontractors engaged in the manufacturing of products on behalf of ET or otherwise participating in any aspect of ET's supply chain.

### Management systems

The Supplier shall develop and maintain appropriate management systems to ensure continuous improvement in its operations and thereby enhance its compliance with this Code of Conduct. Furthermore, the Supplier shall establish and maintain internal policies that ensure ethical production practices and environmental responsibility. In this regard, the Supplier shall implement and maintain efficient systems to ensure that these policies are effectively executed and monitored. The Supplier is required to conduct risk assessments of all its facilities to identify areas requiring improvement and to perform annual self-evaluations of its own facilities as well as those of its subcontractors to ensure compliance with this Code of Conduct.

### Ethics

The Supplier shall uphold the highest standards of ethical integrity in its interactions with workers, suppliers, and representatives of ET. The Supplier shall actively oppose corruption in all its forms, including extortion, as well as public and commercial bribery.

### Whistleblowers

The Supplier shall implement an anonymous mechanism enabling workers to report workplace grievances. Such mechanism shall be supported by policies ensuring the protection of workers who, in good faith, report complaints or grievances.

### Ethical sourcing of materials

The Supplier is required to source raw materials and fabrics responsibly. No animals shall be harmed in the production of products for ET. Materials of animal origin must derive from animals treated in accordance with applicable animal welfare laws and internationally recognized standards. The production and assembly of raw materials must not conflict with human rights. If ET determines that cooperation with certain companies, regions, or countries is inconsistent with this Code of Conduct, the Supplier shall respect such decision and immediately cease any sourcing related to products for ET.

### A healthy, clean and safe working environment

The Supplier must create and maintain a healthy, clean and safe working environment.

#### Emergency preparedness

The Supplier shall ensure a safe and healthy working environment at all times. All necessary fire safety measures must be implemented, including adequate alarm systems, provision and maintenance of fire safety equipment, employee training in fire response, and clearly marked emergency exits and escape routes. A written and communicated emergency response procedure must be in place. The Supplier shall also comply with all safety regulations regarding the use, storage, and handling of chemicals. Employees must be adequately trained in chemical handling, and a complete and updated Material Safety Data Sheet (MSDS) shall be maintained for all chemicals on site.

#### Training and communication

The Supplier must proactively take responsibility for the general health and safety of employees. All employees shall undergo effective training and information sessions regarding health and safety precautions in the workplace. Factory management should actively facilitate the establishment of workers' health and safety committees.

#### Reducing the risk of injury

The Supplier must provide a safe, clean and healthy working environment, in which adequate space and services for employees are provided. To prevent injury the Supplier must also do a thorough risk assessment of all areas of the facility and ensure, that employees are not working in a dangerous environment. The Supplier must provide sufficient and well-maintained personal protective equipment, and all risks must be clearly signed. Furthermore, to ensure a safe and healthy workplace there must be a sufficient number of employees trained in first aid and adequately stocked first aid kits available to all employees.

#### Living areas

The Supplier must ensure all dormitory buildings are separate from the factory building. Dormitories must have sufficient living and storage space for workers, and all necessary services must be provided. Dormitories, kitchens and dining areas shall also present all necessary health and safety as well as fire safety precautions.

#### Environmental protection

All applicable environmental laws must be followed by the Supplier, who shall set up an environmental management plan to minimize the effect of business activities on the environment.

#### Chemicals

All chemicals and hazardous materials must be safely handled, transported and disposed of according to law, with detailed records kept. The Material Safety Data Sheet must be available in the local language, where the chemicals are used.

#### Energy efficiency, air emissions and climate change

The Supplier commits to be working on reducing their energy consumption and greenhouse gas footprint. Resource consumption, waste and emission generation during production and operation must be monitored and controlled.

#### Cleaner production and waste management

Natural resources must be used with respect by the Supplier, who shall also work to improve resource efficiency. The Supplier shall implement methods to reuse or recycle waste production and emissions to the extent reasonably possible. Additionally, the Supplier shall use water responsibly and work to minimise water footprint, including reducing water use and implementing water recycling as much as reasonably possible. Furthermore, the Supplier must treat and dispose of wastewater according to applicable law or the benchmark guideline in the industry, whichever is higher.

#### Human rights and labour rights

Human rights and labour rights are extremely important to ET.

##### Forced or involuntary labour

The Supplier must not use any illegal workers or any kind of forced labour. Workers should have the right to terminate a contract after legal notice, and they should not be directed to leave any form of deposit or identity papers with their employer. A signed employment contract must be easy understandable and available to all workers. Workers must furthermore have free access to toilets, water and religious facilities, and they shall have permission to leave the factory under reasonable circumstances.

##### Working hours and rest

This Code of Conduct seeks to ensure righteous working hours and adequate rest. In that regard the working hours must always be kept within legal limits and benchmark industry standard. Working hours shall not on a regular basis exceed 48 hours per week, and the Supplier must provide adequate rest days classified as at least 1 day off in a 7-day period. Overtime shall be voluntary, and it shall not exceed 12 hours per week. Any overtime must always be compensated at a premium rate, and it must not be demanded on a regular basis. Employees are entitled to refuse overtime without incrimination.

##### Compensation

The Supplier shall ensure adequate compensation and must always comply with current laws concerning compensation for work, including overtime payments and payment procedures. Deductions from wages, which are not required by law, must not occur, and wages shall not be withheld. Employees are entitled to at least the statutory minimum wage or the standard benchmark rate in the industry, whichever is higher. The wage shall be enough to meet basic needs and provide some discretionary income. In that regard the Supplier is expected to be open and to actively work on reaching a sustainable solution to provide fair living wages.

##### Collective bargaining and freedom of association

The Supplier shall recognise ILO conventions and the Universal Declaration of Human Rights on freedom of association, freedom of opinion and expression, the right to organise and collective bargaining. The Supplier will not interfere with workers' unions and will not prevent workers from joining these unions. In connection workers must not face prejudice due to union membership or active participation in workers' committees. Worker representatives shall have access to carry out their function in the workplace. In cases where freedom of association and the right to collective bargaining is restricted or prohibited under law, the employer must facilitate alternative forms of independent and free worker representation and negotiation in accordance with international labour standards.

### Discrimination and harassment

It is also of importance for the workers to be ensured freedom from harassment and discrimination regarding race, colour, caste, nationality, religion, gender, age, sexual orientation or marital status.

### Child labour and young workers

The prevention of child labour and the protection of young workers are of the highest importance to ET. Under no circumstances shall the Supplier employ any child under the age of 15, including during school holidays. Where a higher minimum age is prescribed by applicable law, such higher age shall apply. The Supplier shall establish and maintain effective management systems to ensure that no children are employed. In cases where workers under the age of 18 are employed, they may only perform light work, and all applicable laws and regulations concerning the treatment of young workers must be strictly observed.

If child labour is identified in a factory, the Supplier must immediately implement the following corrective measures:

- The child must be removed from the workplace and provided with a viable alternative. This intervention must always be carried out in the best interest of the child, ensuring that the child is not forced into worse forms of labour.
- When communicating with the child and the child's family or caretakers, the Supplier must identify an appropriate educational option for the child until he or she is no longer of compulsory school age. The Supplier must continue to pay wages to the child from the date of removal from the workplace until the child reaches the age at which compulsory education ends.
- The Supplier shall immediately offer the vacated position to an adult member of the child's family or to the child's caretaker. The child shall be given the option to work in the factory once he or she has reached the legal minimum working age.

### Audit and Documentation Requirements

The Supplier is solely responsible for:

- obtaining and maintaining valid proof-of-age documentation (e.g. birth certificates, government-issued IDs) for all employees,
- ensuring that such documentation is available for inspection at all times, and
- implementing effective internal procedures to prevent child labour.

Upon ET's request, the Supplier shall immediately provide access to the above documentation and shall grant ET, or any third party designated by ET, access to carry out both announced and unannounced audits.

### Sanctions and Remedies

Any breach by the Supplier of the provisions on child labour and young workers, as set out in this Code of Conduct, shall constitute a material breach of contract. In such case, ET shall be entitled to immediately terminate any contractual relationship with the Supplier. The Supplier shall, furthermore, pay ET a contractual penalty of EUR 100,000 per incident. If the Supplier has previously confirmed to ET that a breach has been remedied, but a subsequent breach of this provision occurs, the contractual penalty shall be doubled to EUR 200,000 per incident. The obligation to pay any contractual penalty, as also stated in Appendix 1 with respect to breaches of the provisions on child labour and young workers under this Code of Conduct, shall apply without prejudice to ET's right to claim additional damages. Any contractual penalties collected under this provision shall be allocated by ET to initiatives aimed at preventing child labour in the affected region.

### Regular employment and protection of vulnerable groups

Small workshop subcontractors, temporary workers, and homeworkers must be employed in accordance with applicable labour laws and regulations. The Supplier shall further ensure that any third-party agent or service provider supplying labour complies with this Code of Conduct and with all applicable legal requirements.

### Executive Management

Mark Nielsen and Søren Larsen

*Version 10.2025*