



September 2024

## ***ALPI Code of Conduct***

ALPI is a trustworthy company that conducts business in Denmark and abroad based on integrity and trust from customers, stakeholders, employees and the public. Ethical business behaviour and transparency are key principles.

Our historical values and the principles of the UN Global Compact are the starting point for ALPI Code of Conduct.

The ALPI Code of Conduct is a supplement to our supplier agreements to ensure compliance with rules and legislation throughout the value chain.

## **GENERAL PRINCIPLES**

ALPI shall:

- comply with laws and regulations in the countries in which ALPI operates
- demonstrate and promote its commitment to honesty, fair and responsible business practices
- integrate the principles of this Code of Conduct.

## **REQUIREMENTS FOR BUSINESS PARTNERS**

ALPI wishes to co-operate with suppliers who share the principles set out in this Code of Conduct.

ALPI expects business partners to confirm their compliance with this Code of Conduct or apply standards of business behaviour that are consistent with this Code of Conduct.

## **RESPONSIBILITY FOR COMPLIANCE**

It is the responsibility of ALPI management to implement this policy and inform employees of their rights, obligations and responsibilities and to act in accordance with the content and wording of this document within their area of responsibility.

It is the responsibility of each employee to comply with local laws and ALPI policies. Actions that violate this Code of Conduct will not be tolerated and may result in dismissal and legal consequences.

## **WHISTLEBLOWER**

ALPI has a whistleblower scheme, which is administered by an external partner. In addition to the usual reporting channels, ALPI's employees can use the whistleblower scheme to report serious matters, including suspicion or knowledge of illegal, unethical or irregular behaviour. Whistleblowing reports are handled with full confidentiality and ensure that employees are not subject to retaliation because of a report.



## CONFIDENTIALITY AND DATA SECURITY

### *Data Ethics & Security:*

At ALPI, we focus on cyber security. We endeavour to integrate solutions and security parameters that prevent data leakage, phishing and general malicious cyber-attacks/intent.

We have external partners who test our general security parameters to ensure a constant focus on improving our digital security.

We have processes in place to ensure and protect ALPI's and not least our customers' data in a responsible manner.

## ENVIRONMENT AND CLIMATE

At ALPI, we are dedicated to being a key player in the green transition through significant investments and innovative solutions. We are a partner to our customers and suppliers in this transition, offering advice and detailed carbon reports to support the common sustainability goals.

We have targets for reducing our carbon emissions and shifting transport to more sustainable alternatives in line with technological and infrastructure opportunities and customer demand. ALPI's business strategy is continuously adapted to meet the risks and opportunities presented by the green transition.

We comply with all regulatory reporting requirements and ALPI's commitment to sustainability is an integral part of the company culture and long-term strategy to create a better future for all.

## HUMAN AND LABOUR RIGHTS

### **Human rights**

We support and respect the protection of internationally recognized human rights and ensure that we are not complicit in human rights abuses.

### **No discrimination**

All employees shall have equal opportunities based on skills, experience and performance, regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, trade union membership or ethnic origin.

All employees must be treated with respect. Discrimination, physical or verbal harassment and illegal threats will not be tolerated.

### **Work environment and culture**

All employees shall be provided with the necessary conditions for a safe and healthy working environment. A work environment that complies with safety standards and promotes employee well-being. We focus on a culture where co-operation and mutual respect contribute to a good and strong team spirit.

At ALPI, we have a common set of values - High5 - which is the starting point for how we interact with our customers, business partners and each other. Both a collegial and commercial code of conduct has been drawn up.



## **Forced labour**

We do not accept forced labour, which includes:

1. **Forced labour:** No employee may perform work under the threat of punishment or other forms of coercion.
2. **Debt bondage:** Employment relationships where the employee is forced to work to pay off a debt will not be tolerated.
3. **Restriction of freedom of movement:** No employee shall have their identification papers taken away and we do not require a security deposit upon hiring.

Employees have the freedom to leave their position with reasonable notice, in accordance with applicable laws or contractual agreements.

## **Child labour**

We do not tolerate child labour, including the employment of persons under the legal working age or the use of children in work that may be harmful to their health, safety or morals.

## **Freedom of association**

We comply with all relevant laws and international standards regarding freedom of association and collective bargaining. We respect the right of employees to join a trade union that represents their interests as employees and to bargain collectively or individually.

We respect the recognized trade unions. An employee's right not to join a trade union is also respected.

Employees will not be discriminated against or harassed because of their trade union activities.

We promote open and constructive dialogue between management and employee representatives, and inform employee representatives and relevant public authorities of major

changes in our operations.

## **Working hours and compensation**

We comply with all applicable national and EU laws, agreements and industry standards around working hours and compensation. This includes EU law on time recording and compliance with the Working Time Directive.

# **ANTI-CORRUPTION AND BRIBERY**

## **Anti-corruption**

We do not engage in - or support - any corrupt practices.

Representatives of ALPI must not offer customers, potential customers, suppliers, consultants, governments or public authorities any rewards or benefits that are in violation of applicable laws to obtain or retain business or to obtain other forms of improper advantage.

We do not accept payments, gifts or other forms of compensation from a third party that may influence or appear to influence our objectivity in business decisions.

