

KAJ MADSEN

INTERNATIONALE TRANSPORTER

**SUPPLIER CODE
OF CONDUCT**

2026



TABLE OF CONTENT

Respect, Inclusion, and Workplace Culture	3	Modern Slavery and Forced Labour	7
Workplace Safety and Well-being	3	Commitment to Sustainability	7
Integrity and Ethical Business Practices	4	Promoting Diversity and Inclusion in Leadership	8
Data Protection and Cybersecurity	5	Accountability, Reporting, and Ethical Responsibility	10
Human Rights Due Diligence	6	Final Commitment	11



RESPECT, INCLUSION, AND WORKPLACE CULTURE



We strive to create a workplace where everyone feels valued and respected, regardless of their background.

All employees, suppliers, and stakeholders, **regardless of gender, age, ethnicity, religion, disability, sexual orientation, or political beliefs**, are treated *equally and fairly*.

We foster a culture of teamwork, mutual respect, and open communication, ensuring that all voices are heard and valued.

We uphold a strict **zero-tolerance policy** against all forms of **bullying, harassment, and intimidation**, whether *verbal, physical, psychological*, or otherwise. It includes, but is not limited to, **sexual harassment, inappropriate remarks or behavior, unwanted advances**, and any actions that create a hostile or uncomfortable atmosphere.

WORKPLACE SAFETY AND WELL-BEING

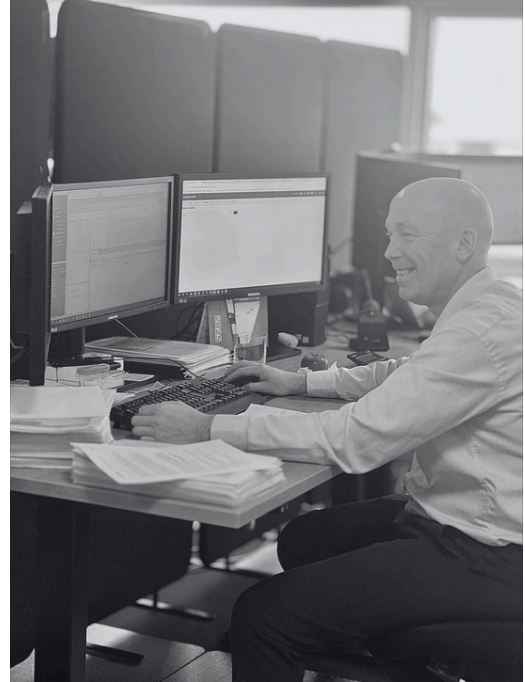
A **safe, healthy, and secure work environment** is one of our top priorities at Kaj Madsen. We are committed to ensuring the well-being of all employees, suppliers, and business partners by maintaining strict safety protocols, regular training, and a proactive risk management approach.

We maintain a **zero-tolerance policy** regarding **substance** (*alcohol, drugs, or any other substances that impair performance or pose a safety risk*) in the workplace.

Employees or suppliers found under the influence while *on duty* will face disciplinary action, up to and including termination of employment or immediate contract suspension.

All employees and suppliers are expected to:

- **Adhere** to all health and safety regulations,
- **Report** any unsafe conditions, hazards, or accidents immediately to their supervisor or the designated safety officer,
- **Participate** in safety training programs and emergency preparedness drills.



We take **mental well-being** seriously, recognizing that a healthy work environment is not only about physical safety but also about fostering a positive and supportive atmosphere. Employees are encouraged to *speak up* if they experience **stress**, **burnout**, or **mental health** challenges to ensure a healthy work-life balance.

INTEGRITY AND ETHICAL BUSINESS PRACTICES

Our business practices are built on the foundation of **ethical conduct** and **responsible decision-making**, ensuring that every action taken within the company reflects our commitment to *fairness, trust, and accountability*.

COMPLIANCE

Employees and suppliers must **comply with all applicable laws, industry regulations, and internal policies** to maintain full integrity of our operations.

We expect our every employee and supplier to act with *responsibility, diligence, and good judgment* in all professional interactions.

CONFLICT OF INTEREST

All employees and suppliers must **avoid conflicts of interest**, ensuring that personal or external influences do not compromise their professional integrity, work responsibilities or the company's best interests to ensure mutual trust, accountability, and long-term success.

CONFIDENTIALITY

All employees and suppliers are expected to safeguard sensitive company information and handle it professionally. Disclosure of proprietary or confidential data to unauthorized parties is strictly prohibited, as it can jeopardize company's competitive position, legal standing, and trust with stakeholders.



As part of our **zero-tolerance policy on bribery and corruption**, we strictly **prohibit** any form of **offering, giving, requesting, or accepting bribes** or **improper payments**, whether directly or indirectly.

This applies to all *employees, suppliers, contractors, and business partners* engaging in transactions or negotiations on behalf of the company. All business dealings must always be conducted ethically, transparently, and in full compliance with international anti-corruption laws.

DATA PROTECTION AND CYBERSECURITY

We are committed to protecting personal, confidential, and operational information and to maintaining information security across all our operations. We process data responsibly and in accordance with applicable data protection legislation, including the General Data Protection Regulation (GDPR), where relevant.



Suppliers are expected to apply the same standards when handling information related to Kaj Madsen, its customers, employees, or business partners.

All information must be **protected** against **unauthorized access, loss, misuse, alteration, or disclosure** and handled securely throughout its entire lifecycle.

In the event of any actual or suspected data breach, cybersecurity incident, or unauthorized access that may impact Kaj Madsen or related parties, **suppliers must notify Kaj Madsen without undue delay and cooperate fully in investigation, mitigation, and remediation efforts.**

We implement appropriate technical and organizational measures to safeguard data and maintain adequate cybersecurity practices that ensure the confidentiality, integrity, and availability of information and reduce the risk of data breaches or cyber incidents.



HUMAN RIGHTS DUE DILIGENCE

We are committed to respecting internationally recognized human rights and expect our suppliers and business partners to do the same throughout their own operations and supply chains.

Suppliers are required to conduct **risk-based human rights due diligence**, including identifying, preventing, mitigating, and addressing actual or potential adverse human rights impacts related to their activities, products, or services.

This includes, but is not limited to:

- **FAIR WORKING CONDITIONS**
- **FREEDOM OF ASSOCIATION**
- **PROTECTION AGAINST FORCED OR COMPULSORY LABOR**
- **PREVENTION OF DISCRIMINATION**
- **RESPECT FOR LOCAL COMMUNITIES AND VULNERABLE GROUPS.**

MODERN SLAVERY AND FORCED LABOUR

Kaj Madsen has **a zero-tolerance policy toward modern slavery, forced labor, human trafficking, and all forms of exploitation.**

Suppliers must ensure that all work is voluntary, no form of forced, bonded, or compulsory labor is used and employees are free to leave employment with reasonable notice. Furthermore, no identity documents, passports, or other personal papers can be withheld and employees cannot not be subject to recruitment fees or debt bondage.



Any indication of modern slavery or forced labor must be reported immediately and will result in corrective actions, up to and including **termination of the business relationship.**

COMMITMENT TO SUSTAINABILITY

As a company operating in the transport and logistics sector, we recognize the importance of sustainability and are committed to **minimizing our environmental footprint, reducing emissions, optimizing resources, and fostering a more sustainable supply chain.**

Suppliers are encouraged to set measurable environmental targets and demonstrate progress over time through documented actions and performance improvements.

Our sustainability efforts focus on:

REDUCING CARBON EMISSIONS

We continuously seek ways **to improve fuel efficiency, optimize transport routes, and invest in lower-emission vehicles** and technologies to reduce our overall environmental impact.

MINIMIZING WASTE

Employees and suppliers are encouraged to **adopt waste-reduction strategies**, including **responsible packaging**, **recycling initiatives**, and **efficient use of materials** in daily operations.

ENERGY EFFICIENCY

We strive to enhance **energy efficiency** across all facilities, implementing measures to **reduce unnecessary energy consumption** and **invest in renewable energy sources** where possible.

SUSTAINABLE SOURCING

We work closely with our suppliers to ensure that **materials** and **products** used within our operations **align with ethical** and **environmental standards**, *prioritizing sustainably sourced materials* whenever feasible.

COMPLIANCE AND CONTINUOUS IMPROVEMENT

Our company adheres to **all applicable environmental regulations** and **industry standards** while proactively seeking new ways to improve our sustainability performance.

We encourage our **employees, suppliers, and business partners** to actively contribute to these efforts by setting **measurable environmental targets** and demonstrating **progress over time** through documented actions and performance improvements.

PROMOTING DIVERSITY AND INCLUSION IN LEADERSHIP

We are committed to **breaking traditional gender barriers** in the transport industry and ensuring that leadership opportunities are accessible to all individuals based on merit, skills, and performance.

Our approach to diversity is not just about meeting targets but about **fostering a workplace culture where everyone has a fair and equal chance to succeed**.



As part of this commitment, we strive to create a more balanced and inclusive environment by continuously increasing opportunities for **underrepresented gender** in **administrative** and **leadership** roles.



This initiative is about ensuring that **talented individuals, regardless of gender**, have **equal opportunities to grow** and **succeed** within our organization.



EQUAL CAREER ADVANCEMENT OPPORTUNITIES

Ensuring that every **promotion, leadership training, or professional development program** is based solely on *skills, experience, and qualifications*.

BUILDING AN INCLUSIVE CULTURE

Creating a work environment where everyone, regardless of gender, background, or identity, feels **valued** and **empowered to pursue leadership roles**.

To achieve this, we focus on:

INCLUSIVE RECRUITMENT PRACTICES

Encouraging a wider talent pool by removing biases from the hiring process to ensure all candidates are assessed fairly and objectively.

WORKPLACE POLICIES THAT SUPPORT DIVERSITY

Implementing **flexible work arrangements, mentorship programs, and leadership development initiatives** that support career growth.

ACCOUNTABILITY, REPORTING, AND ETHICAL RESPONSIBILITY

We are committed to fostering **a culture of integrity, transparency, and accountability**. Maintaining high ethical standards is a shared responsibility, and we expect all employees, suppliers, and business partners **to uphold the principles outlined in this Code of Conduct**.



Employees and suppliers are urged to **report** any potential breaches of this Code to their **supervisor** or a **designated HR representative**.

Alternative whistleblower mechanisms are also available to ensure that concerns can be raised confidentially and without fear of retaliation.

Retaliation against individuals who report concerns *in good faith* is **strictly prohibited** and will not be tolerated.

Failure to comply with the principles outlined in this document may lead to **disciplinary action**, including but not limited to:

- verbal or written warnings,
- suspension or termination of contracts or employment,
- legal action,
- reporting to relevant authorities in cases of severe violations.



By ensuring that everyone within our **organization** and **supply chain** takes accountability for ethical conduct, we safeguard the integrity of our business operations and reinforce a responsible, fair, and trustworthy work environment.

FINAL COMMITMENT

This Code of Conduct reflects our **commitment** to being a responsible and **forward-thinking organization**.

By adhering to these principles, we create a positive and productive work environment for everyone at Kaj Madsen and our supply chain.

Any dispute shall be subject to the exclusive jurisdiction of the District Court of Kolding, Denmark.

We reserves the right **to verify compliance** with this Code of Conduct through **documentation reviews, self-assessments, or audits**, conducted either directly or by a third party.

All suppliers are expected to **cooperate** and **address identified non-compliances** within an agreed timeframe.

This Supplier Code of Conduct forms an **integral part of all contractual relationships** with Kaj Madsen, unless otherwise agreed in writing.

Compliance with this Code is a condition for doing business with Kaj Madsen, and failure to adhere to its principles may result in corrective actions, suspension, or termination of the contractual relationship.



THANK YOU