



CODE OF CONDUCT ver. 2019

ULLMAX feels that it is increasingly important for us to take responsibility for all our actions throughout the world. Most importantly we have a responsibility towards every person that takes part in the production of our products. We must make sure that no one who contributes to our success is deprived of his or her human rights or suffers any harm.

In order to make our position clear to our suppliers we have set up a Code of Conduct. It is a non-negotiable requirement from our side that all of our suppliers and their subcontractors, without exception, must follow this code.

General Rights

Our suppliers shall follow the national law stated in the country from where they act. All applicable laws and legislations, including the ones related to work, health, security and surroundings must be followed.

In accordance with UN's general declaration regarding human rights, suppliers shall respect workers right to be affiliated with unions and negotiate collectively.

No forced labor of any type is permitted.

Discrimination

No discrimination is permitted. Employees shall have access to work and training on the same conditions, regardless of gender, age, race, skin color, sexual orientation, political opinions, religion or social identity. Physical harassment and physical oppression are not permitted.

Wages

Wages must be paid directly to the employee on the agreed date and in full. All information about the wage shall be available to the employees in a manner that is easy to understand. The wage shall be above the legal minimum wage and be more than sufficient to cover basic needs.

Working hours

The working hours shall follow national legislation. Overtime shall be voluntary and shall be paid for with extra compensation or according to the legal minimum level. National legislation regarding paid leave must be respected. Employees shall have at least 24 hours of uninterrupted time off each week.

Working environment

The supplier must provide a sound and safe working environment. Good lightening, heat and ventilation should be adequate for the proposed work assignments under all times of the working hours.

The workers shall have access to clean drinking water at all times.

The number of toilets shall be sufficient for the numbers of workers working in the plant.

Health and safety

The supplier shall provide employees with protective clothing and other safety equipment in accordance with internationally agreed health and safety standards at no expense, should the need arise.

Security of employment

The supplier shall endeavor to hire personnel for long periods on the basis of a negotiated written contract. The employer shall apply at least the same period of notice towards the employee as the employee has to the employer.

Female workers should be given their stipulated maternity leave in case of pregnancy, based on national law. Workers taking maternity leave shall be entitled to return to their employment on the same terms and conditions that applied to them prior to taking leave and they shall not be subject to any discrimination, loss of seniority or deduction of wages.

Insurance

The supplier shall ensure that the employees are covered by the relevant state or private insurance schemes, covering disablement, injury and pension. Employees injured at work as a result of some other cause than negligence or disregard of the safety rules must be compensated for loss of income. In those cases where the injury is fatal, compensation shall be awarded to the family

Child labor

Children under the age of 15, or below the legal school age, may not be hired; the higher of these criteria applies. Young workers shall have the opportunity to participate in training or educational programs. Employees under 18 shall not work at night or under hazardous conditions.

Environment

The environment is of increasing concern globally and ULLMAX expects its suppliers to act responsibly in this respect. This includes measures in order to support a sustainable development such as environmental management

systems and information regarding the environmental, health, and safety impacts of activities.

Suppliers must be committed to reduce the environmental impact of their business by adopting best practice principles and continuously seek improved methods to minimize any adverse environmental impact of their operations, including emissions, resource use and waste.

Our suppliers must comply with all applicable environmental laws and regulations within the country of operation.

ULLMAX is required to comply with the European Chemicals legislation called REACH that is in force since 1st of June 2007. REACH is an abbreviation for **Registration, Evaluation, Authorization and restrictions of Chemicals**. REACH affects all EU-actors that professionally manufacture, import, sell, buy, distribute or use chemicals as such and in articles.

ULLMAX require that all our suppliers have the knowledge about REACH and that they follow updated information on the website of the European Chemicals Agency (ECHA), <http://ECHA.europa.eu> that is the European Authority for REACH on behalf of the European Commission.

When the manufacturer has a choice between two chemicals that serve the same purpose, he/she should choose the chemical that is less harmful to the environment.

Wool, feather, leather and other products from animals

All suppliers to companies subscribing to this policy must adhere to national and international legislation on animal welfare as well as be encouraged to adhere to the Five Freedoms defined by EU Farm Animal Welfare Council/World Organization by Animal Health (OIE). These are:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury and disease
- Freedom to express normal behavior
- Freedom from fear and distress

In order to promote these practices and enhance the traceability in the supply chains, all suppliers should also be encouraged to place the same demands on their sub-contractors and cooperate to improve the industry dialogue. In addition, some material specific requirements are placed on the suppliers:

Wool

The origin of the wool must not be sheep that have been subject to mulesing or farms that practice mulesing. All wool used for ULLMAX products should be "Non-Mulesed"

As far as it is possible to declare, the wool must not originate from sheep that has been plucked or shaved in a manner that has caused the animals to suffer or getting harmed.

The long-term objective is to promote and enhance traceability in the supply chain as well as to be able to secure also humane transportation methods. In

order to succeed, all parties in the supply chain should be encouraged to strengthen their control of their respective suppliers to enhance the dialogue in the industry.

Corruption, Extortion, Embezzlement and Bribes

ULLMAX is only prepared to do business with companies that use sound and ethical practices.

Corruption, extortion, and embezzlement, in any form, are strictly prohibited and may result in immediate termination as a supplier to ULLMAX and in legal action.

Suppliers may not offer or accept bribes or other means of obtaining undue or improper advantage.

Monitoring and Enforcement

The principle of trust and co-operation

ULLMAX expects all its suppliers to respect the above Code of Conduct and actively do their utmost to achieve our standards. We trust our own staff to take a high level of responsibility for their work, and we expect from our suppliers that they do the same. We believe in co-operation and we are willing to work with our suppliers to achieve workable solutions in each individual case.

We are willing to take in consideration cultural differences and other factors which may vary from country to country, but we will not compromise on our basic requirements regarding safety and human rights.

Monitoring

All suppliers are obliged to keep ULLMAX informed about where each order is being produced. ULLMAX reserves the right to make unannounced visits to all factories producing our goods, at any time. We also reserve the right to allow an independent third party of our choice to make inspections. To ensure compliance with our Code of Conduct.

Non-compliance

Should we find that a supplier does not comply with our Code of Conduct, we will terminate our business relationship with this supplier, if corrective measures are not taken within an agreed time limit.

If we find repeated violations, we will immediately terminate the co-operation with the suppliers and cancel our existing orders.