

CODE OF CONDUCT

REV. 2 – 28-02-2024

Purpose

The purpose of this Code of Conduct is to articulate BJ-Gear's commitment to ethical business practices in alignment with human and labour rights, environmental sustainability, business ethics, and anti-corruption efforts.

Exceptions

This Code of Conduct is designed to apply universally across BJ-Gear's operations, acknowledging that unique or unforeseen situations may arise. In such cases, we maintain our commitment to the highest ethical standards.

Policy

BJ-Gear is dedicated to responsible business operations, contributing to sustainable development while upholding a high degree of integrity. We endorse the ten principles of the UN Global Compact and have established this Code of Conduct as a comprehensive guide for ethical behaviour within our organization.

Reporting Mechanisms

Employees facing ambiguous scenarios should seek guidance from managers, or through our reporting mechanisms. This ensures our actions always align with the principles of integrity and responsibility, even when specific guidance is not detailed in this document. Reporting of breaches shall be conducted through one of the following channels:

- Inform nearest manager
- Inform CEO
- Inform CPO
- Inform CFO / HR Manager
- Report issues to our whistleblower system

1 Complying with legislation

In addition to this Code of Conduct, we expect our employees to comply with all applicable international, national, and local legislation and all applicable provisions and industry standards. Where a local legislation sets higher standards than those set out in this Code of Conduct, the local law takes precedence.



2 Human rights

2.1 Human rights in general

BJ-Gear recognizes its responsibility to respect human rights and labour rights as expressed in the International Bill of Human Rights and the eight core conventions of the International Labour Organization. BJ-Gear commits to avoid infringing on human rights and labour rights and to address and remedy any adverse impacts with which BJ-Gear is involved.

2.2 Privacy

BJ-Gear respects the right to privacy of employees and customers. We respect personal data, obtained, or used in information processing and handle all personal documents in accordance with the General Data Protection Regulation.

2.3 Discrimination

BJ-Gear does not discriminate customers or others in our value chain based on race, skin colour, gender, language, religion, political or other beliefs, age, disability, nationality, social or ethnic background, financial circumstances, sexual orientation, origin, or other status recognized by international law.

2.4 Impacts on local communities

BJ-Gear assess and address the impact of our activities on the human rights of local communities where we are present.

2.5 Country risk

BJ-Gear takes the necessary steps to avoid involvement in human rights violations in those countries where we operate.

2.6 Health and safety

BJ-Gear ensures a safe and healthy working environment.

- We are responsible for employee health and safety.
- We provide training and ensure that employees are trained in health and safety matters.
- We assess risks and take the best possible precautions in relation to accidents and occupational diseases.

2.7 Salary, remuneration and leave

BJ-Gear pays our employees a salary and remuneration that ensures they can maintain a reasonable standard of living and as a minimum, we comply with local laws and regulations for minimum wages. Salaries are paid via legal means of payment at least once a month.

Employees are entitled to sickness leave and maternity leave in accordance with local legislation.

2.8 Working hours

BJ-Gear respects that the total number of working hours of a normal working week must not exceed 48 hours. With overtime included, the normal working week must not exceed 60 hours in total. Overtime must be planned in a way that ensures safe and humane working conditions. Our employees may work more than 60 hours if they freely wish to do so, should local legislation permit it.

The total number of consecutive working days must comply with local legislation and employees are entitled to at least one day off a week.

2.9 Coercion and disciplinary sanctions

BJ-Gear does not use or tolerate physical punishment, threats of violence or other forms of physical or psychological coercion or abuse.



2.10 Freedom of speech

BJ-Gear ensures that employees can express their dissatisfaction with their working conditions openly and loyally without fear of reprisals. We do not engage in retaliatory actions to prevent employees from reporting any non-compliance with the Code of Conduct. Additionally, employees have the option to report concerns via our whistleblower system, providing an alternative avenue for confidential reporting.

2.11 Stance against purchase of sexual services and child pornography

BJ-Gear take a stance against purchase of sexual services, sexual exploitation of children and child pornography. Such activity might support trafficking, which is a violation of Human Rights. BJ-Gear employees on assignments and/or business travel are expected to respect and comply with this stance, both during and after working hours.

3 Labour rights

3.1 Child labour

BJ-Gear will not become involved in child labour – either directly or indirectly.

In general, children should not work until they are above the compulsory school age. The minimum age for full-time employment is 15 years (or 14 years should local legislation permit it). Employees who are younger than 18 years old must not carry out hazardous work or work at night, regardless of the number of hours they work. The minimum age for light work/after-school work (work that does not interfere with a child's education) is 13 years of age (or 12 years should local legislation permit it).

With regard to all types of work, we endeavour to take special care when organising work tasks, working hours and workloads considering the young age of the employee.

3.2 Forced labour and freedom of movement

BJ-Gear does not use forced or bonded labour – either directly or indirectly. Forced or bonded labour is any kind of work or service that is performed involuntarily under threat of penalty. Employees must have the right to freedom of movement during their employment.

- We do not withhold personal documents; work permits or salaries from our employees as this can prevent the employees from leaving their employment.
- We give employees confirmation of working terms and conditions, in accordance with local legislation.

3.3 Discrimination

When hiring people or during employment, BJ-Gear does not discriminate based on race, skin colour, gender, language, religion, political or other beliefs, age, disability, nationality, social or ethnic background, financial circumstances, sexual orientation, origin or other status – either directly or indirectly. We offer all individuals equal opportunity and make active efforts to achieve a corporate culture and workplace free from discrimination and harassment. BJ-Gear does not tolerate sexual harassment or any other kind of harassment of employees.

3.4 Freedom of association and the right to collective bargaining

BJ-Gear does not interfere with the right of employees to join a union or their right to collective bargaining.

In situations or in countries where freedom of association and collective bargaining is restricted by local legislation, we recognise that employees can exercise their freedom of association and collective bargaining in some other way.

4 Environmental commitments

In addition to being ISO14001 certified, BJ-Gear actively engages in initiatives and projects promoting environmental sustainability. Recognizing the urgent need to address climate change, we have conducted comprehensive CO2 calculations and integrated ambitious CO2 reduction targets into our Quality and Sustainability Policies, reflecting our commitment to minimizing our environmental impact.

We continuously work towards reducing waste, emissions, and the implementation of eco-friendly technologies. Our commitment extends beyond compliance; we aim to lead by example in our industry by setting and achieving high standards for environmental stewardship.

4.1 Product safety

In our pursuit of environmental sustainability, BJ-Gear places a strong emphasis on the environmental safety of our products. We are committed to designing and manufacturing products that not only meet rigorous safety standards but also minimize environmental impact throughout their lifecycle.

5 Conflict Minerals

BJ-Gear is committed to not sourcing products or components containing "Conflict Minerals." We employ due diligence processes and adhere to certifications to verify the mineral origin, discontinuing cooperation with any supplier found in violation.

6 Business Ethics and Anti-corruption

BJ-Gear exercises zero tolerance towards corruption. We provide training programs and awareness campaigns for employees. Illustrative examples and case studies are incorporated to highlight our commitment.

Our zero-tolerance approach towards corruption does not prevent us from maintaining and promoting excellent business relations with customers and other partners if any exchanged advantage is moderate and exchanged openly and in accordance with this Code of Conduct.

BJ-Gear supports and aims to achieve fair competition. BJ-Gear must therefore comply with all relevant competition rules and refrain from concluding unlawful anti-competitive agreements as well as exchanging unlawful price and/or market information with competitors.

7 Conflicts of interest

Ownership or board memberships in competing companies must be approved by the Chairman of the Board of Directors. Employees are guided on disclosing potential conflicts of interest, ensuring transparency in agreements and recruitment processes.

8 Confidentiality and data security

BJ-Gear protects confidential business information about our goods and data. Confidentiality is maintained both during a person's employment and after they have left the company. We respect the intellectual property rights and confidential information of others.

8.1 Information Handling

BJ-Gear is committed to ensuring the confidentiality, integrity, and availability of all information and data in our possession. Employees are entrusted with sensitive information, including personal and proprietary data, and are expected to handle it with the utmost care and responsibility.



8.2 Data Protection Regulations

We adhere to all applicable data protection regulations, including but not limited to the General Data Protection Regulation (GDPR) and other relevant local laws. Employees are required to be familiar with and comply with these regulations in all aspects of their work.

8.3 Access Control

Access to sensitive information is restricted to authorized personnel only. Employees must use secure passwords, protect access credentials, and promptly report any suspected unauthorized access.

8.4 Data Encryption

When transmitting sensitive information, employees use secure channels and encryption methods to safeguard data from unauthorized interception or access.

8.5 Device Security

All electronic devices (computers, laptops, mobile devices, etc.) used for work purposes are password-protected, kept up-to-date with security patches, and equipped with approved antivirus software.

8.6 Data Backup

Regular backups of critical data are essential to ensure business continuity and data recovery in case of unexpected events. Employees should adhere to backup procedures established by the IT department.

8.7 Reporting Security Incidents

Employees must promptly report any suspected or actual security incidents, including data breaches or unauthorized access, to the IT department and management.

8.8 Training and Awareness

Employees will receive training on data security practices during onboarding and regularly thereafter. It is essential that employees stay informed about evolving threats and best practices to maintain a secure working environment.

8.9 Third-Party Data Handling

When engaging with third parties that involve data sharing, employees must ensure that these parties adhere to similar data protection standards and contractual agreements.

9. Monitoring and Continuous Improvement

BJ-Gear operates under the framework of an ISO 9001 certified Management System, this fosters a culture of continual improvement, where every employee is empowered to suggest and implement improvements in their respective areas. Innovation and efficiency enhancements are actively encouraged to improve our quality and sustainability related performance.

Responsibility:

The Management Group oversees training and implementation, ensuring alignment between daily operations and this Code of Conduct. Regular updates and communication regarding changes to the Code of Conduct will be provided. Training of employees at all levels of the company will be conducted with a regular interval to raise awareness about the Code of Conduct and any changes to it.



Inclusivity:

We are committed to fostering an environment where every employee feels valued, respected, and empowered regardless of their race, gender, age, religion, sexual orientation, disability, or any other characteristic that makes our team members unique.

Conclusion:

BJ-Gear is committed to conducting business with the highest ethical standards, and this Code of Conduct is a testament to that commitment. Any breach of this Code may result in disciplinary actions, including dismissal. The safety and well-being of our employees are paramount, and no one should be exposed to personal danger for any reason.

This document is dynamic and will evolve to reflect new insights, business practices, and ethical considerations. We encourage open dialogue and continuous improvement, ensuring BJ-Gear remains a responsible and principled organization across all operations.

Sign-off:

Date: 29-02-2024



Flemming Graversgaard
CEO



Guido van Gucht
Quality and sustainability manager

