

Troldekt

Supplier Policy

This Supplier Policy describes the required code of conduct for suppliers or external service providers

Effective Date 25.09.2025

Introduction

Troldekt and its affiliates ("Troldekt") are committed to conducting their business activities with integrity, and in a responsible and ethical manner. Troldekt expects the same high standards of its contractors, suppliers, and other business partners.

This Supplier Policy (the "Policy") applies to all organisations that provide goods or services to Troldekt (a "Supplier" or "Suppliers").

The Policy sets out Troldekt's expectations of Suppliers, generally in terms of business practices, and specifically with respect to:

- Applicable law;
- Business integrity;
- Environmental Responsibility;
- Ethical employment practices;
- Anti-Bribery and Corruption;
- Sanctions;
- Competition Law Compliance
- Personal Data Protection; and
- Raising concerns.

Where the requirements of this Policy exceed the minimum standards prescribed in the legislation applicable to a Supplier, the Supplier is expected to adhere to the Policy requirements in addition to the applicable legislation.

Suppliers are expected to maintain appropriate processes and systems to fulfil their obligations of this Policy and to be able to evidence in writing adherence to the requirements contained herein.

Compliance with Applicable Law

Each Supplier shall comply with all applicable laws, statutes, regulations, and codes as are from time to time in force.

Business Integrity

Trolldtekt's Objectives

Trolldtekt recognises the safety, health, environmental, social, legal and ethical impacts of all supply and procurement decisions, and will involve its suppliers in addressing any issues that may arise. Trolldtekt is committed to excellence in safety, health and environmental management. Trolldtekt expects its suppliers to assist in minimising any negative effects and neutralising any risks.

Trolldtekt will develop supply strategies and processes that attempt to achieve best value for money in procuring the goods and services that meet its needs and are within legal and ethical standards.

Trolldtekt will develop relationships that are the most appropriate to gaining a mutual understanding of the needs of Trolldtekt whilst understanding Supplier capabilities. These relationships will ensure consistency of quality, reliability, availability, timeliness, fitness for purpose and performance at affordable cost.

Trolldtekt will work with suppliers, offering appropriate support, and make reasonable demands in relation to the improvement of existing standards.

Trolldtekt expects both its employees and those of its Suppliers to transact with integrity in a trustworthy and responsible manner.

Trolldtekt expects both its employees and those of its Suppliers to act impartially and objectively in all their purchasing activities and to keep written records where appropriate to demonstrate that their actions have been fair and above reproach.

Trolldtekt expects its employees to adopt best practice, when issuing competitive tenders or invites supplier quotes, judging bids on the merits of their competitive offerings and total life cycle cost. Trolldtekt expects both its employees and those of its Suppliers to maintain an unimpeachable standard of integrity in all their business relationships and to foster the highest possible standards of professional competence in all their supply activities.

Trolldtekt expects its employees and Suppliers to comply with the law of the countries in which they operate and with which Trolldtekt deals, and in all contractual obligations incurred by or on behalf of Trolldtekt.

Supplier Requirements

Suppliers must ensure that their products and services are produced and delivered in line with all laws, local regulations and best industry standards and practices.

Suppliers are expected to assign responsibility for internally communicating and implementing this Trolldtekt Supplier Policy to an appropriate manager or responsible person and, if requested by Trolldtekt, make a written statement of intent regarding the policy, including how it will be implemented and communicated to its employees and suppliers.

If requested by Trolldtekt, Suppliers must report progress on the implementation of this Policy by describing actions taken and detailing future planned activity.

Suppliers must assume responsibility for the adoption and implementation of acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards under which products are made and services provided. This includes all work contracted or sub-contracted.

Suppliers are encouraged to highlight to Trolldtekt any areas of legal or ethical concern so that both organisations can have a constructive dialogue about resolving any gaps and deficiencies.

Suppliers should seek continuous improvement in the way the company produces and delivers its products and services and manages its supply chain relationships.

Environmental Responsibility

Trolldtekt is committed to working holistically with sustainability, playing a leadership role in tackling climate change; placing emphasis not only on minimizing the environmental impact, but on optimizing resource consumption and processes.

Trolldtekt works strategically with sustainability through our Cradle to Cradle certification, and is actively part of Kingspan's Planet Passionate sustainability programme. Trolldtekt requires all of its Suppliers to support these efforts in this mission and to consequently conduct their operations in such a manner as to cause minimal environmental impact and to continually improve their operations so as to reduce that environmental impact. This implies that our suppliers contribute with documentation of their production and compounds of the goods either directly or via an independent third party.

Suppliers are encouraged to publicly disclose, at least annually and in line with recognized reporting standards, their environmental strategies, targets, actions and metrics relevant to the above topics.

Environmental Management System

Suppliers shall carry out operations with care for the environment and must comply with all relevant laws and regulations regarding the protection and preservation of the environment. All required permits, licenses and registrations will be obtained, maintained and kept up to date.

Suppliers shall maintain and operate an Environmental Management System (EMS) covering their business operations and manufacturing processes, as applicable. The content of this EMS shall be in line with the requirements of ISO 14001, covering:

- Environmental policy;
- Planning;
- Implementation and operation;
- Checking; and
- Management review.

Resource Conservation & Circularity

Suppliers shall undertake best practice actions with regard to energy and water management and conservation, to minimise the environmental impact of their operations processes.

Suppliers should engage in the development and use of climate-friendly products/materials and processes, looking at the principals of circularity, to reduce virgin and non-renewable resource consumption.

Suppliers should monitor and report on resource consumption across their operations, including energy, water, and materials.

Suppliers should increase the use of secondary and sustainably sourced renewable resources and improve resource efficiency. Strategies and business models should align with circular-economy principles, including landfill diversion of waste and design for reuse or recycling.

Waste

Suppliers shall ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects, for all waste streams, including hazardous waste.

Suppliers shall dispose of waste responsibly, using approved, registered waste contractors.

Suppliers should observe the waste hierarchy, and minimize waste within their operations and supply chain, where practical.

Localised Emissions

Suppliers shall monitor all localised emissions to their operations. Suppliers should seek to reduce air emissions and water discharge within their operations where practically possible and strive to achieve best practice with regards to the quality of emissions beyond legislation.

Suppliers are encouraged to set science-based greenhouse gas (“GHG”) emission reduction targets that are consistent with the goals of the Paris Agreement and to implement mitigation actions compatible with limiting global warming to 1.5 °C.

Suppliers whose operations fall within high climate-impact sectors are expected to identify and assess their material climate-related risks and opportunities and evaluate the resilience of their strategy and business model in relation to climate change.

Protection of the Natural World

Suppliers are expected to:

- Protect biodiversity and ecosystems, particularly in and around biodiversity-sensitive areas;
- Avoid and reduce pollution and phase out materials that have material negative impacts; and
- Respect local water resources and prevent ecosystem loss, degradation, desertification, and soil sealing.

Ethical Employment Practices

Trolldtekt supports the protection of human rights and expects its Suppliers to observe the International Bill of Human Rights (“IBHR”),¹.

Where a Supplier is found not to observe the IBHR it shall be immediately required to change its work practices so as to place them in-line with the objectives of the IBHR, with a failure to do so constituting a material breach of the contractual relationship between the parties. Trolldtekt Suppliers are expected to support Trolldtekt’s commitment to respect human rights through:

Child Labour

Trolldtekt is guided by the Fundamental Convention of International Labour Organisation (“ILO”), and as such requires its Suppliers not to utilise any form of child labour in their business operations.

Anti-Slavery

Suppliers are required to ensure that all work relating to their operations is completed voluntarily and without slavery, servitude, forced or compulsory labour or human trafficking. Workers shall have the freedom to terminate their employment with the respective Supplier at any time without penalty, upon giving reasonable notice.

¹ Comprising the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil Rights.

Compliance with Immigration Laws and Regulations

Suppliers must ensure that all employees have the legal right to work, and any migrant workers should be in possession of a valid work permit issued by the relevant authority.

Working Hours

Suppliers are required to comply with all applicable laws pertaining to working hours, but at the very minimum must ensure that working hours are not excessive and that no worker shall be made to work overtime under the threat of penalty, dismissal, denunciation or as a disciplinary measure.

Working Environment

Suppliers will provide their employees with a workplace free of discrimination, harassment, abuse and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.

Supplier should ensure their employees have access to water sanitation and hygiene.

Suppliers will comply with all applicable health and safety regulations

Suppliers shall have adequate management systems to predict hazards and protect the health and safety of all people at their place of work and under their control. This must include a formal and regular assessment of risks, implementation of safe systems of work, the reporting of incidents and a programme of continuous improvement in safety performance.

Suppliers shall protect their employees from any workplace hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees.

Equality

Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.

Anti-Bribery and Corruption (“ABC”)

Trolldtekt does not tolerate bribery and corruption in any form.

Trolldtekt expects that its Suppliers shall maintain the standards set by Trolldtekt, and to that end, Trolldtekt requires its Suppliers to ensure that its employees are prohibited from offering, promising, requesting, accepting or agreeing to accept anything of value to or from any person for the purpose of improperly obtaining a commercial advantage or inducing the other party to act in a manner that is improper. Trolldtekt also requires its Suppliers to maintain appropriate policies to prevent bribery and corruption.

Trolldtekt requires its Suppliers not to make facilitation payments irrespective of local custom, to include appropriate ABC clauses in contractual arrangements within the Suppliers' supply chain.

Sanctions

Trolldtekt is committed to full compliance with all applicable economic, trade, export control, anti-terrorism, and financial sanctions laws, regulations, and restrictive measures. These include those imposed by the United Nations (UN), the European Union (EU), the United Kingdom (UK), the United States (including the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC)), and any other applicable authorities.

Trolldtekt strictly prohibits any direct or indirect business dealings with sanctioned persons, entities, or countries, including but not limited to those designated under:

- The UN Security Council Consolidated List;
- The EU Consolidated Financial Sanctions List;
- The UK Sanctions List;
- The U.S. Specially Designated Nationals (SDN) List maintained by OFAC; and
- Any similar sanctions lists maintained by relevant national or supranational authorities.

Suppliers must ensure that they do not engage, directly or indirectly, in any business transactions that would violate applicable sanctions.

Each Supplier must:

- Conduct due diligence to verify that neither the Supplier nor its affiliated entities, subcontractors, agents, or end customers are subject to sanctions;
- Screen transactions and business partners against applicable sanctions lists to prevent any prohibited dealings;
- Promptly report any concerns or potential violations to Trolldtekt; and
- Cooperate fully with any compliance checks or requests for information related to sanctions compliance.

Competition Law Compliance

Suppliers must conduct business in full compliance with all applicable competition and antitrust laws. This includes refraining from any anti-competitive agreements, price-fixing, bid-rigging, or abuse of market dominance.

Personal Data Protection

Where Suppliers process personal data on behalf of Trolldtekt or within the scope of their own operations, they must:

- Comply with all applicable personal-data protection laws and regulations (including the EU General Data Protection Regulation (GDPR) where relevant);
- Implement appropriate technical and organisational measures to ensure the security and confidentiality of personal data; and
- Engage on appropriate contractual terms with any sub-processors to maintain these standards.

Raising Concerns

Trolldtekt is committed to conducting its business activities to the highest standards of integrity. In support of this objective, Trolldtekt maintains a confidential independent service for raising concerns and expects its Suppliers to strongly encourage their employees to raise concerns through this service should they encounter conduct of Trolldtekt or its employees which fall short of the standards contained in this Policy.

The Confidential Independent Service for Raising Concerns can be accessed via our webpage www.trolldtekt.dk under Trolldtekt Suppliers.

For any other inquiries please find the contact detail below:

Trolldtekt A/S

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This Trolldtekt Supplier Policy is hereby accepted and agreed by:

Name of Company

Date of Signature

Name of signee

Signature