

CODE OF CONDUCT FOR BTX GROUP



btx[®]
group

Introduction

BTX Group conducts its business in a responsible manner.

In a world undergoing constant change, where globalization is a condition for growth and progress, we will do our utmost to ensure that responsible production and business principles are applied within the company as well as by our suppliers.

Our aim is to ensure that everyone involved in the supply chain of our products is respected and treated with dignity and that all efforts are made to ensure that national and international Human Rights and Labour laws are followed. This Code of Conduct is based on The Universal Declaration of Human Rights, UN conventions as well as ILO conventions and recommendations

Acceptance and compliance with this Code of Conduct is therefore an integral part of all business agreements with BTX Group. This Code of Conduct defines minimum requirement and BTX encourages all suppliers to strive for constant improvement within all areas of this Code of Conduct.

The principles apply to all the brands of BTX Group, and BTX Group requires that all suppliers confirm with their signature that their own sub-suppliers in turn comply with this Code of Conduct.

BTX Group's Code of Conduct comprises these items:

Child labour

Pay and working hours

Discrimination

Coercion and harassment

Forced labour

Work environment

Freedom of association

Environment

Anti-corruption

Animal welfare



Control Inspections

BTX Group's Code of Conduct is an integral part of all contracts, which BTX Group has made with its suppliers. In other words, the suppliers confirm with their signature that they will comply with BTX Group's Code of Conduct.

In the event that certain conditions do not comply with BTX Group's requirements, the supplier must draft an action plan together with BTX Group and set a deadline to remedy the situation. BTX Group will subsequently conduct a control inspection to check if the situation has been remedied. By preparing action plans and conducting control inspections, BTX Group helps ensure ongoing improvement of conditions at the premises of its suppliers.

Scope

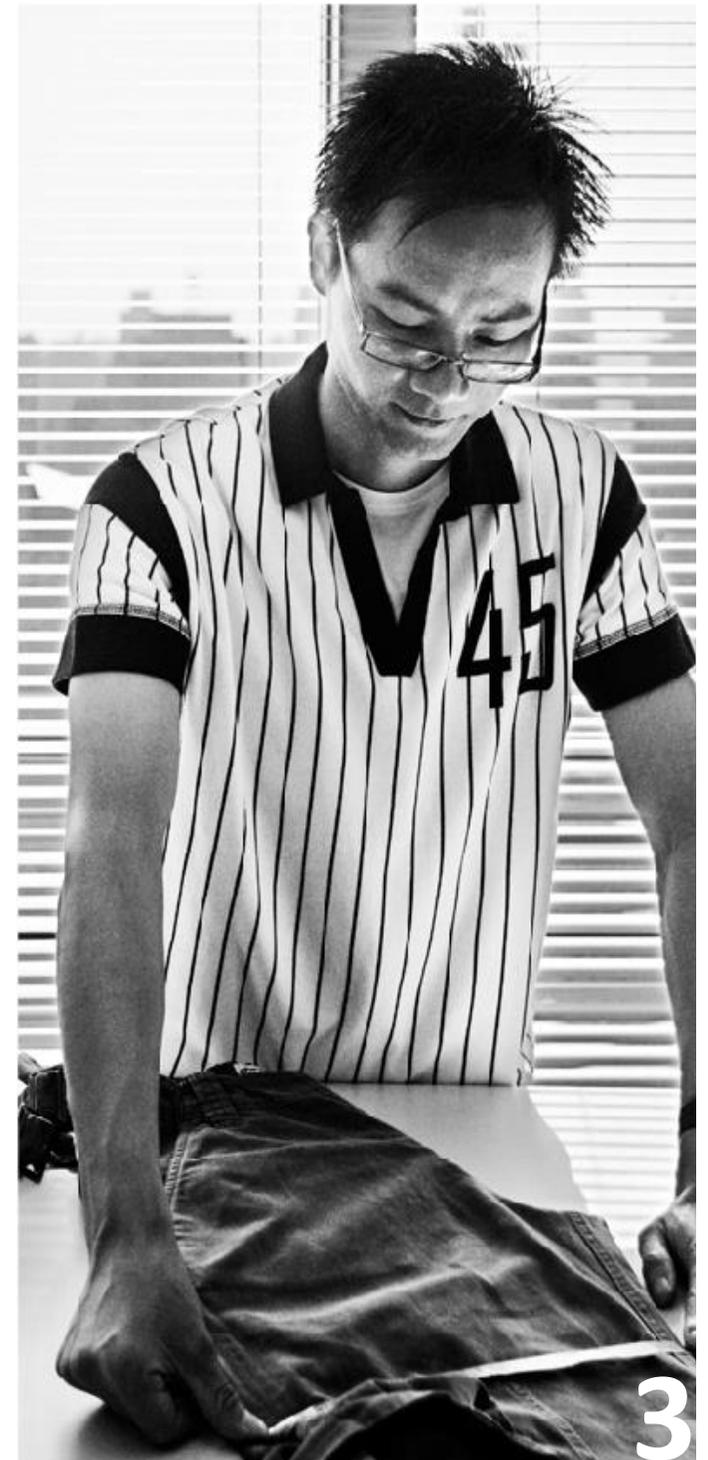
BTX Group complies with the principles in this Code of Conduct and demands that its suppliers do the same by implementing a relevant business policy and appropriate management systems. The suppliers are responsible for ensuring that their sub-suppliers comply with the BTX Code of Conduct. In the following text, the word "supplier" also includes the sub-suppliers of all BTX Group's suppliers.

Compliance with Legislation

Suppliers must comply with all current local legal provisions, regulations and industry standards.

Publication

Suppliers must ensure that the content of the BTX Code of Conduct is communicated to all employees and that they understand the code, for example by putting up notices internally in the company.



Employment Practices

The company must not be involved in child labour – whether directly or indirectly. As a general rule, children should not work until they are beyond the compulsory school age, and the minimum age for full-time employment is 15 years (or 14 years if permitted according to local legislation).

Employees under 18 years of age must not carry out hazardous work or night work, regardless of the number of hours worked. For this type of work, the employees must be more than 18 years old, and the supplier must comply with all local legislation. The minimum age for light work/spare time work (work that does not interfere with the child's education) is 13 years (or 12 years if permitted by local legislation).

Children under the minimum age employed full-time must be offered education as well as spare time work. If the child is below the minimum age for light work/spare time work, the supplier must offer the child or its family severance pay, in addition to the offer of education. BTX Group will help the supplier implement a socially responsible action plan.

For all types of work, the supplier must endeavour to plan the tasks, the working hours and the workload with due regard for the young age of the employee. If BTX Group becomes aware of child labour, it reserves the right to involve local and international organizations to ensure correct measures are taken in addition to all other actions described in this Code of Conduct.



Forced Labour and Free Movement of Labour

No forced labour may be used – whether directly or indirectly. Forced labour is defined as a job or service carried out by a person against his/her will under threat of punishment. The employees have a right to free movement in connection with their employment. Guards may only be used for normal safety reasons to protect employees and company property. An employee's personal papers, work permit or pay cannot be withheld.

Coercion and Disciplinary Sanctions

Physical punishment, threats of violence and other forms of physical or mental coercion or mistreatment are not allowed. Disciplinary sanctions in the form of fines or reduction in pay are not allowed.

Discrimination

Direct or indirect discrimination in connection with employment or work on account of race, skin colour, gender, language, religion, political or other persuasion, age, nationality, social or ethnic background, financial circumstances, sexual preferences, origin or any other status is not allowed. Female employees cannot be requested to undergo a compulsory pregnancy test. Employees cannot be requested to undergo a compulsory HIV or AIDS test.



Pay, Remuneration and Holidays

Employees must be paid a wage that guarantees them a reasonable standard of living (a living wage), and local legislation and rules for minimum wage must be complied with. In addition, any remuneration set out in local legislation must also be paid. The wage must be paid in legal tender at least once a month. In situations where the legal minimum wage does not secure a reasonable living wage, the supplier is encouraged to supplement the employees' wage to ensure their requirements are met. The employees are entitled to absence due to illness and parental leave in accordance with local legislation.

Working Hours

A working week should, in general, not exceed 48 hours. Overtime must be voluntary and be planned in such a way as to ensure safe working conditions. The scope of the overtime work must comply with local legislation and the overtime work must be paid in accordance with local legislation. The number of consecutive working days must comply with local legislation, and the employees are, as a minimum, always entitled to at least one day off per week.

Employment Conditions

The employees must be given a written confirmation of their terms of employment if required according to local legislation.



Freedom of Association and the Right to Collective Bargaining

The company must not interfere with or prevent the rights of employees to become members of a union or with their rights to collective bargaining as defined in local legislation.

Freedom of Expression

Reprisals must not be used to prevent the employees from expressing dissatisfaction with their working conditions in an open and loyal manner. In connection with control inspections, the employees must have an opportunity to inform the inspectors of any breaches of this code without fear of reprisals.

Fixed rules must be in place for the handling of work disputes. The rules must provide the employees with an effective means of objecting to disciplinary sanctions against them. The company must accept and comply with decisions made in accordance with such rules.

Work Environment

It is the responsibility of the company to provide a safe and healthy work environment that complies with local legislation. One or more management representatives are responsible for drafting written policies and procedures regarding health, safety, social welfare and general facilities and for ensuring their compliance.



Environment

Chemicals: It is mandatory to follow and comply with the chemical restrictions of EU's chemical legislation REACH and the restrictions described in BTX Group's Supplier's manual. All chemicals and hazardous materials must be handled and disposed safely, according to local laws and regulations. Our suppliers must follow these restrictions as they are made to protect workers, consumers and the environment.

Water: It is expected that suppliers use water responsibly and implement water recycling as much as possible. The disposal of any wastewater must be according to local laws.

Waste: In all production processes suppliers shall seek to improve resource efficiency in order to reduce resource consumption and minimize emissions and waste production. It is expected that suppliers implement methods to re-use or recycle waste.

Anti-Corruption and Anti-Bribery

BTX Group is committed to upholding high standards of business integrity, honesty and transparency in all its business dealings, and is committed to preventing bribery or corruption by BTX Group or those connected with it. Thus it is expected that all suppliers comply with local laws, any other applicable anti-bribery laws and international good practice, and that they make their best effort to eliminate bribery or corruption.

Animal Welfare

In BTX Group we care about animal welfare. We only use parts of animal origin, e.g. real fur, which are by-products from the food industry. It is a demand that the production complies with all relevant international agreements, laws and government approved standards. We do not accept that any animals are exposed to unnecessary suffering or injury.



Inspection and Evaluation

BTX Group reserves the right to monitor and inspect suppliers at any time to ensure they comply with this Code of Conduct. All documents that can be used to prove compliance with BTX Group's Code of Conduct must be stored in the company.

All suppliers are obliged to provide full access for inspection on site, including unannounced visits by BTX Group and/or appointed representatives of the company. Full access must be given to any information that can reveal whether BTX Group's Code of Conduct is complied with, and BTX Group and/or its representatives must be given an opportunity to conduct confidential interviews with randomly selected employees during these inspection visits.

The result of all inspection visits are documented in inspection reports. If an on-site inspection reveals that this Code of Conduct is not being complied with, BTX Group will engage in a constructive dialogue with the supplier in question to improve conditions. BTX Group will demand satisfactory action plans with a view to correcting any breaches of the code and will conduct follow-up inspections to ensure that the necessary improvements have been carried out.

Date

Supplier

Version 2015.1

