

Responsible Sourcing Policy – Elgiganten A/S

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1. Introduction

At Elgiganten A/S, we have a duty to ensure the products we sell and the goods and services we use, are responsibly sourced.

This Policy sets out the high standards we expect from you as our supplier/partner and your supply chains. The standards operate in addition to your expected compliance with all relevant national and international legislation.

Please take the time to read and familiarize yourself with this Policy. These standards should be seen as our minimum requirements, meeting fundamental responsibilities in the areas of human rights, labour, environment, anti-corruption and social impact.

2. Who does this policy apply to?

The Policy is relevant to our suppliers, contractors and sub-contractors, outsource partners and shop-in-shops, joint ventures and franchisees.

3. What is expected of Elgiganten A/S's suppliers and partners?

- **Respect the Human Rights and ensure appropriate working conditions for employees**
 - Respect internationally recognized human rights, wherever you operate.
 - Conduct appropriate human rights due diligence that covers all your business relationships, implementing a human rights policy that is appropriate to the nature and scale of your business
 - As members of the Ethical Trade Initiative we believe that our suppliers should either comply with or make steps towards full compliance with the ETI Base Code as detailed below:
 1. Employment is freely chosen
 2. Freedom of association and the right to collective bargaining are respected
 3. Working conditions are safe and hygienic
 4. Child labour shall not be used
 5. Living wages are paid.



6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

For further information please refer to the following link <https://www.ethicaltrade.org/resources/eti-base-code>

- **Minimize the environmental footprint/impact of your organization**

- Where appropriate for the size of your organization develop, implement and publish an environmental policy that demonstrates care for the environment
- Actively seek to minimize the use of resources and reduce waste and emissions.
- Whilst any form of reduction is encouraged the following areas are of interest to the goods and services that Elgiganten A/S procure:
 - Look to reduce and where possible eliminate the use of single use plastics
 - Understand your carbon footprint, set targets to reduce greenhouse gas emissions and respond to Carbon Index reporting, e.g. the CDP Climate Change questionnaire
 - Develop products that are:
 - easily repairable/modular and provide us with detailed instructions of how to complete those repairs
 - facilitate the recycling of components
 - not needlessly overpackaged and use materials that are easily recycled/reduce pollution
 - energy efficient/low carbon
 - Minimize vehicle emissions (for example using of liquefied petroleum gas (LPG)/electric/hybrid technologies instead of fossil fuels)
 - Store, handle and use and dispose of hazardous materials in the appropriate manner. Hazardous materials should only be used when no other viable option is available, this includes within the products you procure and/or manufacture (REACH, ROHS, POPs, etc.)

- **Operate with a high standard of integrity and business ethics**

- Prohibit any form of bribery, corruption, fraud or extortion
- Not offer or accept gifts, payments or other advantages that may be intended to influence business decisions
- Ensure that appropriate controls exist to prevent any involvement in financial crime, terrorist financing or money laundering.

- **Provide goods and services that:**

- Keep the personal data of customers and employees alike safe, respecting all relevant privacy laws and regulations
- Meet all relevant safety standards, maintain records of testing and monitoring and mark products appropriately

- **Implement the following business practices:**

- Continuous improvement
- Risk Management



- Develop effective methods to be aware of all relevant legislation (both national and international) and ensure that your organization and the products/services it provides complies with them
- Where possible, leverage your unique business capabilities / resources to make a positive social impact locally, e.g. relevant charity partnerships, training and development, incentive schemes, etc.
- Consider collaborations and initiatives that influence positive behaviors, e.g. recycling

It should be noted that the above is not an exclusive list and may be in addition to other, more detailed, policies or provisions in contracts that address specific compliance areas which apply in addition to this policy; abiding by it does not guarantee that you will not be exposed to legal, regulatory, reputational or other risks. If you are unsure or unclear of any legal or regulatory requirements you must seek appropriate professional advice.

We want to build strong, long term relationships with our supply chain and will always seek to collaborate with you to resolve issues as the first option. The delisting of a supplier for breaches of our Responsible Sourcing Policy will only occur in instances where they refuse to change or deliberately mislead to hide breaches. We may, from time to time, ask you to verify your compliance.

You should also have high expectations of your own supply chains; ensuring that they also meet the principles of the UN Global Compact and work towards compliance with the ETI Base Code.

We would encourage you to share with us evidence of your successes and/or make suggestions where we can collaborate to mutually mitigate risk.

Please notify us immediately of any changes in your working practices that may breach any part of the above policy.

4. Supporting and related documents

The documents listed below should be read in conjunction with this Policy:

- Modern Slavery Policy;
- Ethical Trade Initiative (ETI) Base Code

If you require further information and assistance in relation to compliance with this Policy, you should speak with your line manager in the first instance or contact responsiblesourcing@dixonscarphone.com.