

# Supplier Code of Conduct for SP Group A/S

SP Group A/S  
Snavevej 6-10  
DK-5471 Søndersø  
CVR no.: 15 70 13 15



# Supplier Code of Conduct

## 1. Purpose of the Policy

At SP Group A/S, we recognise that our commercial success and our corporate responsibility are closely linked to the way in which we collaborate with our suppliers. We regard sustainability as a shared responsibility, in which our value chain plays a vital role in achieving our environmental, social and governance (ESG) objectives.

This Supplier Code of Conduct sets out the principles and expectations that all suppliers and their subcontractors are required to meet. It forms an integral part of SP Group's ESG Policy and is based on the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (UNGPs), as well as applicable international and national legislation.

The objective is to ensure that our suppliers share our ambition to create long-term value through responsible production, respect for human rights, and a systematic approach to protecting the climate and the environment.

## 2. Environment and Climate

SP Group actively works to reduce the Group's environmental and climate impact through innovation, efficient use of resources and responsible use of materials. We expect

our suppliers to contribute to these objectives by conducting their activities in accordance with the principles of sustainable development and the circular economy.

Suppliers must, as a minimum, comply with applicable environmental legislation. However, we expect suppliers to work systematically and in a documented manner with environmental improvements through established environmental management systems, for example in accordance with ISO 14001. There should be a clear focus on measuring and reducing CO<sub>2</sub> emissions, limiting the consumption of energy, water and raw materials, and minimising waste and emissions of pollutants.

Suppliers are encouraged to use recycled and recyclable materials, reduce the use of scarce resources and support the development of environmentally friendly technologies. Environmental directives such as REACH and RoHS must be complied with, and environmental risks must be assessed from a life-cycle perspective.

SP Group expects suppliers to actively document and share data on their environmental performance, including relevant Scope 1, Scope 2 and, where possible, Scope 3 emissions, as a contribution to SP Group's overall ESG reporting.



SP Moulding's factory in Suzhou, China

### **3. Social Responsibility and Human Rights**

As an international group, SP Group places strong emphasis on providing decent and safe working conditions and on respecting internationally recognised human rights. We require our suppliers to do the same.

Suppliers must respect the core conventions of the International Labour Organization (ILO) and ensure freedom of association, the right to collective bargaining and equal opportunities for all employees. No individual must be subjected to discrimination, harassment or unequal treatment on the basis of gender, age, ethnicity, religion, disability, sexual orientation, nationality or political opinion.

All employees must receive a wage that ensures a decent standard of living and not merely compliance with statutory minimum requirements. Working hours must be reasonable, and employees must be entitled to rest, leisure and paid leave. Suppliers must ensure a healthy and safe working environment, prevent occupational accidents and promote employee wellbeing in accordance with the principles of ISO 45001.

SP Group expects suppliers to carry out systematic risk assessments of their activities in relation to human rights and working conditions and to implement due diligence processes in line with the UN and OECD guidelines. Suppliers must be able to document how identified risks are addressed and be

open to collaboration on corrective actions where critical issues are identified.

Furthermore, suppliers are encouraged to actively promote equality and diversity, including representation of the underrepresented gender in management positions, and to offer education and development opportunities that support employees' professional and personal growth.

### **4. Corporate Governance and Business Ethics**

SP Group operates a zero-tolerance policy towards corruption, bribery, fraud, cartel formation and other unethical behaviour. We expect all suppliers to adhere to the same standards. Suppliers must have internal policies, procedures and training programmes in place to support ethical business conduct and prevent corruption.

Any form of improper payment, gift or benefit intended to obtain undue influence is unacceptable. This applies in relation to public authorities, business partners and third parties such as agents, consultants or intermediaries.

Suppliers are expected to establish or participate in whistleblower arrangements that enable employees and business partners to report concerns or violations confidentially and without fear of retaliation. Serious matters affecting SP Group or the Group's supply chain

must be reported to SP Group's Executive Management without delay.

Suppliers must handle personal data and IT security responsibly and in compliance with GDPR and SP Group's data ethics principles. Data processing must respect individual dignity, integrity and the right to privacy.

Finally, suppliers must comply with local tax legislation, report their financial activities in a transparent manner and ensure timely payment to their own business partners in accordance with agreed terms.

### **5. Documentation, Reporting and Continuous Improvement**

SP Group expects suppliers to be able to document their ESG efforts. This may be done through policies, certifications, reports or third-party audits. SP Group may request information or carry out ESG assessments and audits in order to verify compliance.

Suppliers must actively participate in SP Group's ESG efforts and provide relevant data for the Group's reporting under the Corporate Sustainability Reporting Directive (CSRD). If deviations from this Supplier Code of Conduct are identified, the supplier is expected to prepare and implement a corrective action plan in cooperation with SP Group. In the event of serious or repeated violations, SP Group reserves the right to terminate the business relationship.

We seek to develop our supplier relationships through dialogue, transparency and shared learning. We therefore encourage all suppliers to set their own ESG targets, report on progress and contribute to innovation and responsible growth. Together, we can strengthen competitiveness, reduce environmental impact and create a sustainable future for people and the planet.

### **6. Approval**

This Supplier Code of Conduct is reviewed at least once annually and updated as required.

The policy is approved by SP Group's management and published on our website: [www.sp-group.com](http://www.sp-group.com)

Supplier Code of Conduct, version 1.0, approved by Management in December 2025.

## **About SP Group**

SP Group is a leading supplier of manufactured plastic products for the manufacturing industries with growing sales and production from own factories in Denmark, China, the USA, Latvia, Slovakia, Sweden, Finland and Poland. In addition, SP Group has sales and service companies in Sweden, Norway, the Netherlands and Canada.

SP Group is listed on NASDAQ Copenhagen A/S and, as of the end of September 2025, had 2,417 employees and approximately 4,750 registered shareholders.

## **SP Group A/S**

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