



**HJHANSEN**  
Recycling Group

# CODE OF CONDUCT

for Business Partners

Ver. 2,2023-06-13  
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# BACKGROUND

At HJHansen Recycling Group we work to create a world where recyclable materials are treated as resources which must not be wasted or lost.

We strive for a more sustainable utilization of the resources of nature and aim to unify considerations for the environment and our business

HJHansen Recycling Group is one of Northern Europe's leading companies for recycling ferrous and non-ferrous scrap. Our core business is collecting and refining raw materials for recycling, thus giving them new life.

We constantly strive to ensure that the entirety of our value chain is conducted with attention to environmental and climate challenges, working conditions, human rights, and anti-corruption. All stakeholders, from suppliers, agents, subcontractors, and customers, are central to managing HJHansen Recycling Group's global impact. We, therefore, have the same high standards for our business partners as we do for our operations. Consequently, our business partners must comply with the requirements of our Code of Conduct for Business Partners.

HJHansen Recycling Group is based in the EU and thus must report on the CSRD – Corporate Social Responsibility Directive. We encourage all business partners to implement requirements in line with the CSRD standards towards their suppliers and stakeholders.

We also encourage all parties to take on an even bigger responsibility than the law requires. The Code is based on trust, honesty, and respect and is summarized in this document's twenty statements.

If any stakeholder, external or internal, is made aware of issues not conforming to this Code of Conduct for Business Partners or has questions about the matter, please contact the CEO of HJHansen Recycling Group, Mogens Bach Christensen, at [mbc@hjhanzen.dk](mailto:mbc@hjhanzen.dk), or the business partner's contact person at HJHansen Recycling Group.

Furthermore, it is possible to fill in a form anonymously through the Whistleblower Scheme: [Whistleblower Scheme - HJHansen Recycling Group](#).

# LEGISLATION AND COMPLIANCE

In all their activities, business partners of HJHansen Recycling Group must be knowledgeable and comply with all national and international laws and regulations that apply in all countries where they operate. The business partner must uphold all applicable permits, licenses, and required registrations in place.

The WEEE and BAT Directives are particularly important for business partners operating in transporting, treating, repairing, and selling electrical and electronic equipment or batteries.

HJHansen Recycling Group's business partners shall always comply with the highest requirements from applicable legislation or this Code of Conduct for Business Partners. If the local legislation contradicts this Code of Conduct, then the business partner is obligated to inform the contact person at HJHansen Recycling Group of this contradiction.

We further expect our business partners to keep HJHansen Recycling Group informed in the event of any significant changes concerning the approvals and permits they hold.

# MARKET BEHAVIOR, CORRUPTION & BRIBERY

HJHansen Recycling Group business partners are expected to operate their business in a fair and ethical manner, complying with international trading regulations.

Our business partners must respect intellectual property rights and protect confidential information from theft, fraud, and inappropriate disclosure.

Our business partners are not to enter any agreements with competitors on price fixing, market sharing, hampering of innovation, or similar anti-competitive activities violating the rules of fair competition.



## CORRUPTION

International and national corruption and bribery laws are to be complied with.

HJHansen Recycling Group's business partners shall not engage in or tolerate any form of corruption or bribery. Business partners may never offer or receive any illegal payments, favors, or other reimbursements considered undue benefits.



## MONEY LAUNDERING

HJHansen Recycling Group does not tolerate money laundering and expects all business partners not to accept, facilitate, or support money laundering.



## CONFLICTS OF INTEREST

Business partners should not engage in conflicts of interest that could jeopardize the business partner's trustworthiness. That being directly or through someone closely related. If such a situation arises, the business partner is expected to notify HJHansen Recycling Group immediately.





## **GIFTS, ENTERTAINMENT & HOSPITALITY**

Business partners shall refrain from presenting any lavish or excessive gifts, entertainment, or invitations to HJHansen Recycling Group's employees. Any gifts, entertainment and/or hospitality must be reasonable and suitable and reflect the ordinary local legislation and business custom. Personnel may not directly or indirectly provide, or accept, gifts in the form of cash or cash equivalent.



## **CONFIDENTIALITY**

HJHansen Recycling Group's business partners shall safeguard information by keeping it secure, limiting access, and avoiding discussing or revealing it publicly. Any authorized transfer of confidential information is to be done in a way that protects intellectual property rights.



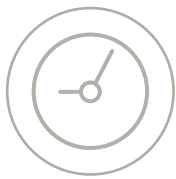
## **RESPECT FOR COMMUNITY RIGHTS TO LAND**

HJHansen Recycling Group's business partners shall respect the rights and titles to property and land of individuals, indigenous peoples, and local communities; this is also in their supply chain.



# WORKING CONDITIONS & HUMAN RIGHTS

The UN's Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work are to be respected and supported by any business partner of HJHansen Recycling Group.



## WORKING HOURS

Working hours should comply with national laws, collective agreements, whichever affords the greater protection for workers. Overtime hours shall comply with national laws and in any case should not exceed more than 60 hours in any 7 days period.

All overtime work must be paid at the legally mandated overtime rate or a premium wage in the absence of this. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

HJHansen Recycling Group's business partners should have a system in place to record working hours.

All workers are granted their stipulated annual, sick, or parental leave.



## REGULAR EMPLOYMENT

HJHansen Recycling Group's business partners should ensure that work performed must be based on a recognized employment relationship. Obligations to employees under labor or social security laws and regulations arising from a regular employment relationship shall not be avoided, such as through sub-contracting, excessive use of fixed-term employment contracts, or apprenticeship schemes with no real intent to impart skills or provide regular employment.





## CHILD LABOR

HJHansen Recycling Group does not tolerate child labor. All business partners are expected to follow and comply with the UN Convention on the Rights of the Child, the ILO's Minimum Age Convention (no. 138) concerning the Minimum Age for Admission to Employment, and the ILO's convention (no. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour in their supply chain.

The term "child" refers to any person under the age of 15 or the minimum age for employment in the country, whichever is highest.

All employment of young workers, including apprentices or vocational students, must comply with laws and regulations on the minimum working age and the compulsory age for schooling.

Young worker protections are in place, where applicable, so that young workers under the age of 18 do not experience conditions in relation to their work that are mentally, physically, socially, or morally dangerous, or harmful, or that interfere with their schooling. Employees under the age of 18 must not work at night.





## **FORCED LABOR**

HJHansen Recycling Group does not accept any form of forced labor, slave labor, or involuntary labor. Our business partners must ensure that they do not take part in any form of human trafficking, prison labor, modern slavery, illegal labor, forced conditions, or anything of that nature in their supply chain.

All work carried out for and by business partners of HJHansen Recycling Group must be based on recognized employment terms in line with local legislation.

All work must be voluntary or at-will, and workers shall be free to leave work at any time or terminate their contract or terms of employment. HJHansen Recycling Group do not accept methods that restrict employees' freedom of movement, and no individual may be kept at work against their will. Employment agreements shall comply with local laws and regulations, inform workers of their legal rights and employment conditions in a language understood by the worker, and be concluded before work has commenced.



## **HARASSEMENT & THREATS**

All workers are to be treated with respect and dignity. Our business partners must ensure that their organization is free from harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, nor is there to be the threat of any such treatment.

Employees of our business partners may not be restricted in the legal and peaceful exercising of their rights.

Further, salary deductions may not be imposed as a disciplinary sanction; unless regulated by collective agreements or approved by law.



## DIVERSITY & NON-DISCRIMINATION

We expect our business partners to treat their employees, workers, or any individual in contact with the given company with equal respect. Consequently, we do not permit discrimination or harassment of any form at our business partners. This is discrimination based on ethnicity, gender, age, nationality, pregnancy, disease, religion, sexual orientation, trade union membership, or political affiliation.



## FREEDOM OF ASSOCIATION

Our business partners are required to support their employees' right to freedom of speech and association. This includes negotiating collectively concerning wages and employment conditions.

HJHansen Recycling Group's business partners should provide reasonable access for employee representatives and ensure that they do not suffer disadvantages or discrimination as a result of their role.



## GRIEVANCE PROCEDURE & REMEDY

Our Business Partners shall have systems in place to enable fair, confidential, and anonymous grievance reporting and follow-up without fear of reprisal. This includes worker whistleblower protections.







## SAFETY & HEALTH

At HJHansen Recycling Group, we expect our business partners to comply with the given legislation and regulations related to the work environment and work conditions, ensuring a healthy, safe, and hygienic workplace to minimize the risk of occupational accidents and injuries.

Efforts towards these means should include but are not restricted to the following: fire safety, evacuation plan, safety equipment and procedures, access to clean toilets and drinking water, first-aid equipment, proper training in machine handling, and correct use of chemical substances in a safe manner.

Potential emergencies and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually, or as local law requires, whichever is more stringent.

We further encourage our business partners to both put on record and follow up on any accidents and near-miss accidents to improve health and safety efforts continuously.

Where needed, workers are to be provided free of charge with appropriate, well-maintained personal protective equipment and educational materials about risks to them associated with these hazards.

Business Partners shall respect workers' right to refuse unsafe work and to report unhealthy working conditions.

Accommodation, where provided, is clean, safe, affordable, meets the basic needs of workers, and conforms to the country's laws. Accommodation should meet or exceed the basic levels afforded in the local community. Workers shall have the freedom to enter and leave at will.



## CLIMATE & ENVIRONMENTAL PROTECTION

HJHansen Recycling Group's business partners must, at minimum, comply with applicable national and international environmental laws and standards in the country/countries where they conduct their activities.

They must comply with applicable regulations regarding air pollution, hazardous waste, water discharge, chemical storage, recycling of waste, and waste management.

Business partners must obtain and retain all necessary permits and licenses for their activities. Upon request, such documents and certificates are to be presented to HJHansen Recycling Group.

HJHansen Recycling Group's business partners shall optimize their consumption of natural resources, including energy and water. They shall identify and reduce the use of hazardous materials, chemicals, and substances. And they must also ensure their safe handling, storage, and disposal.

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion by-products generated from operations are to be characterized, routinely monitored, controlled, and treated as required by law prior to discharge.

We encourage our business partners to continuously take reasonable action to reduce their direct and indirect negative impact on the environment and continuously monitor improvement objectives.









## DISPLACEMENT

When buying goods or components for reuse or upcycling from HJHansen Recycling Group, our business partners must pay particular attention to the environmental impact of the goods in terms of displacement. We thus require a documented assessment to ensure that the process that the components are subjected to will not have adverse environmental consequences. This documentation can be based on a general assessment and does not have to be prepared for each unit sold. The items for reuse must also consider the products' life expectancy, and environmental and energy impacts, to ensure that the products do not contribute negatively to the circular economy.



## TRACEABILITY

When receiving waste and/or commodities for treatment or passed on to a third party, it is of great importance to secure HJHansen Recycling Group's right to request and receive documentary evidence of treatment results, including final recovery certificates. This is crucial data for HJHansen Recycling Group to collect to honor the request for treatment results back in the supply chain of HJHansen Recycling Group.

We urge our business partners to support the circular economy by ensuring traceability and documentation through data and digitization.



# IMPLEMENTATION & AUDITS

The Code of Conduct for Business Partners applies to all business partners of HJHansen Recycling Group.

We reserve the right ourselves or via a third party appointed by HJHansen Recycling Group to carry out an inspection to ensure compliance with this Code of Conduct for Business Partners.

Such inspection of the business partner's facilities and processes will be at HJHansen Recycling Group's expense and with reasonable notice.

Our business partners must be able to present all relevant documents and certifications and, upon inquiry, account for how they comply with HJHansen Recycling Group Code of Conduct for Business Partners.

An identified violation of the Code of Conduct for Business Partners will be registered, and a plan of action must be set and followed.

Hereby, if a business partner does not comply with this Code of Conduct for Business Partners and, upon being notified, does not take the necessary steps to remedy these shortcomings in accordance with a joint plan of action, then we reserve the right to terminate the business relationship officially.





# DIGITAL SIGNATURE

COMPANY NAME

COMPANY ADDRESS

- Street name
- Building number
- Zip code
- Town
- Region
- Country

CONTACT INFORMATION

- Mail
- Phone number

DATE

TITLE

SIGNATURE







# WE GIVE RESOURCES NEW LIFE

Raw material scarcity and strain on the earth's natural resources are facts. With increased and better recycling, we all get more value and more opportunities in the future. Every bit counts.

