

# Code of Conduct for Business Relationships

# Contents

Introduction	3
Management requirements	3
Adopt a Policy Statement	3
Establish and maintain a due diligence process	3
Provide for access to remedy	3
Implementation	3
Review	4

# Code of Conduct for Business Relationships

## Introduction

This Code of Conduct for Business Relationships (CoCBR) serves to assist in implementing our Policy Commitment for sustainable development, in which we state that we expect our business relationships, including customers, suppliers, and partners, to demonstrate responsible business conduct as defined by the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD).

The management requirements set forth in this CoCBR for demonstrating responsible business conduct are aligned with the global minimum standard as defined by the UNGPs/OECD and are distinct from legal compliance.

## Management requirements

Columbus expects its business relationships to implement and maintain a management system fully aligned with the globally agreed minimum standard (UNGPs/OECD). The required management system shall, at a minimum, address:

- Adverse impacts on the human rights stated in the International Bill of Human Rights, including the core labor rights from the International Labour

Organization's Declaration on Fundamental Principles and Rights at Work;

- Significant adverse impacts on the external environment in relation to the areas addressed by the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement;
- Significant risks of adverse impacts on anti-corruption, as related to the scope outlined by the United Nations Convention against Corruption.

These areas are referred to as 'the scope'.

## Adopt a Policy Statement

The Policy Statement should:

- Be approved at the most senior level of the company;
- Be informed by experts in the UNGPs and OECD;
- Stipulate the supplier's expectations of employees and business relationships;
- Be publicly available and communicated both internally and externally;
- Be embedded in operational policies and procedures throughout the company.

## Establish and maintain a due diligence process

Business relationships shall establish a process that allows for regular assessments of risks of actual and potential adverse impacts on the scope. They shall act to prevent or mitigate the identified actual or potential adverse impacts, and these actions shall be tracked to ensure effectiveness. Engaging impacted stakeholders in this process and communicating findings, actions taken, and ongoing status to relevant stakeholders, including Columbus, is expected.

## Provide for access to remedy

Where the business relationship identifies that they have caused or contributed to actual severe adverse impacts on the principles, it must provide access to remedy through legitimate processes (grievance mechanisms) for those affected. Notification of relevant authorities may also be necessary.

If the business relationship is linked to actual severe adverse impacts but does not cause or contribute to them, it is expected to use its leverage to encourage the causing or contributing entity to address the impacts and prevent or mitigate reoccurrence.

## Implementation

- Columbus has implemented the requirements outlined in this CoC and is prepared to share related information or documentation with its business relationships.
- This CoC applies to Columbus's first-tier business relationships. They should expect their first-tier business relationships to have similar and adequate processes to manage adverse impacts on the principles. This includes making business relationships aware of the minimum standard for responsible business conduct as outlined by UNGPs/OECD and requiring that business relationships meet the standard.
- If severe adverse impacts are discovered in a business relationship's value chain, the business relationship must use their leverage to encourage the causing entity to adequately address such impacts and undertake reasonable efforts to ensure that the entity operates in accordance with the minimum standard.
- Business relationships must maintain appropriate records to demonstrate compliance with this CoC's requirements. Appropriate records include: A policy commitment; documentation of due diligence processes, including operational-level impact assessments; transparent records on tracking specific actions; documented grievance mechanisms, and



documentation for similar requirements to their business relationships.

- If Columbus's business relationship causes, contributes to, or is linked to severe impacts on human rights, the environment, or anti-corruption, the business relationship shall notify Columbus immediately or make a public notification. The notification shall include an account of the business relationship's actions to end the severe impacts and to prevent or mitigate their re-occurrence.

**Review**

This Code of Conduct for Business Relationships has been reviewed and approved by the Board of Directors and the Executive Board in Columbus.

The Board of Directors will annually review and, if relevant, update this CoCBR.

Approved by the Board of Directors on 5 December 2024.



**Columbus A/S**

Lautrupvang 6  
DK- 2750 Ballerup Denmark  
Tel.: +45 70 20 50 00  
[www.columbusglobal.com/](http://www.columbusglobal.com/)

CVR no. 13 22 83 45