mekoprint

Culture profile
with ethical guidelines

Culture

profile

The way we collaborate and
do business as a common
Code of Conduct for the
entire Mekoprint Group across
divisions, companies, countries
and locations.

mekoprint.com

Leading new ways™ towards better business and a brighter future

Our shared customer promise and purpose is to lead new ways towards a better business and a brighter future for all, based on a unique breadth of competences anchored in a team-based culture of improvement that focuses on lower resource consumption and ever greater positive environmental and social impact.

Dear Colleague

We have a special place in the world in efficiently and responsibly transforming raw materials into components that are used in products throughout society. This is a task involving many different needs across the industries with which we work, from medical and other professional devices to environmental and energy-related green technologies – ultimately to improve the way we all live.

With our customers and suppliers, we therefore use enormous resources that require a unique interplay of competences and technology, both internally and externally. Meeting the many needs in an increasingly efficient and sustainable way is a constant challenge and balancing act, requiring both innovation and focused action.
How do we find the new ways in practice? How do we succeed as the very best for the benefit of our customers, each other as colleagues, the company›s finances and the surrounding community?

This document describes our common starting point across Mekoprint›s divisions, companies, countries, locations and quality systems, as well as the natural cultural differences that will always exist from team to team. The common denominators of our culture are elements we are expected to constantly live by for the common good, based on our four shared core values and our principles for good collaboration at Mekoprint.

Conversely, the ethical guidelines MUST be adhered to by all of us at Mekoprint, because it is about fundamental principles – from human rights to decency in the way we do business without bribery, corruption and illegal or unnecessary environmental impact. This document has therefore been discussed with all Mekoprint managers and approved by Mekoprint›s Board of Directors as something for which all of us at Mekoprint are to be accountable. It is the manager›s responsibility to implement it in the organisation and to follow up.

Our common culture must always be lived out in direct dialogue with each other, while concerns about the ethical guidelines in special cases require us to contact a manager other than our immediate manager, an HR representative or, in exceptional cases, to report anonymously via the «SpeakUp» whistleblower scheme – which is also described in this document.

We look forward to the continued development of Mekoprint where, both ourselves and through our customers and suppliers, we can make an ever greater difference for both people and the environment with leading solutions and processes!

Best regards
The Mekoprint Management Team

Mekoprint's Management Team from left to right: Benny Albrektsen (Division Director Micromechanics), Søren Holmboe (Division Director Mechanics), Torben Jensen (CFO), Alex Laursen (Business Development Director), Morten Lundgreen (Division Director Graphic Electronics), Marianne Reenberg (HR Development Director), Lars Bo Nielsen (CIO), Anders Kold (CEO), Lars Rasmussen (Division Director Cables).

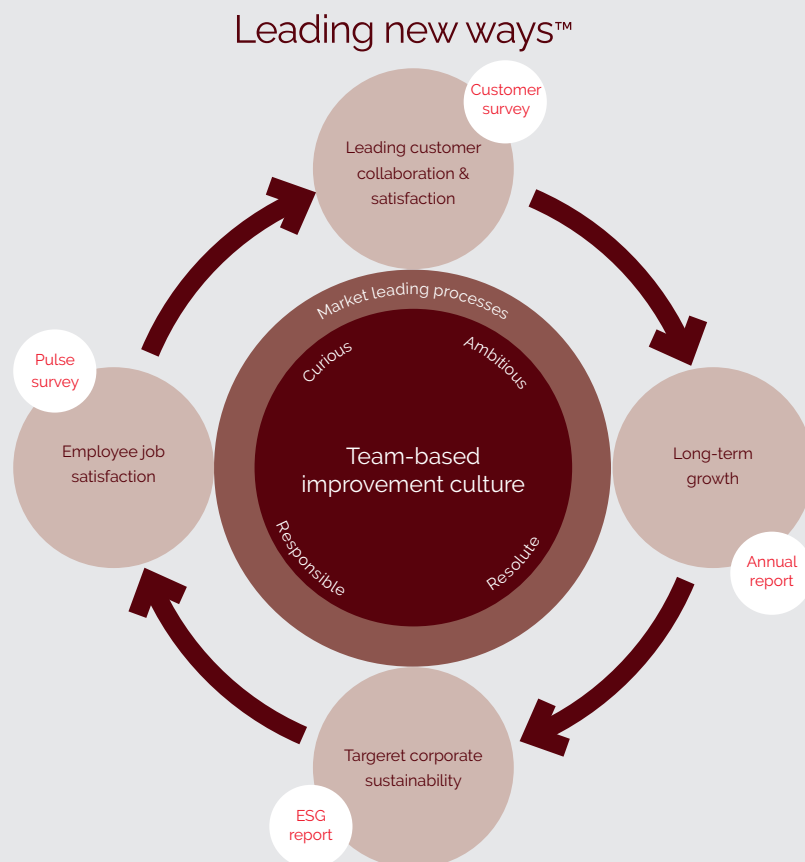Where there's a will, there's a new way.

Common characteristics of our culture

An oft-quoted phrase is that «culture eats strategy for breakfast» because our values, habits and shared way of thinking are typically stronger than the strategy if the strategy does not fit the culture. In other words, we are first and foremost driven by culture!

This is especially true at Mekoprint, where we have been a strong value-based company since the start in 1954 thanks to long-term family ownership with roots in the Danish co-operative movement from dairy to cooperatives and agriculture. The culture of the cooperative movement was characterised by good collaboration, a high degree of independence and a focus on constantly making things better for everyone involved – which is therefore part of the foundation of Mekoprint.

This is one of the reasons we have organised ourselves with a high degree of freedom with responsibility in independent teams that focus on improving their own area – including internal and external customer collaboration, finances and impact on the surrounding community.

This can be seen in the figure below, with our **"team-based improvement culture"** at the heart of all our development.

Leading new ways™

Leading customer collaboration & satisfaction

Customer survey

Market leading processes

Curious

Ambitious

Team-based improvement culture

Responsible

Resolute

Long-term growth

Annual report

Pulse survey

Employee job satisfaction

Targeret corporate sustainability

ESG report

towards better business and a brighter future

ESG stands for "Environmental" (environmental responsibility), "Social" (social responsibility) and "Governance" (corporate governance), which are covered both in our annual report and in an extended, standalone ESG report.

It is the team's improvement culture, driven by management, that will:

1 Develop good team collaboration and a high level of job satisfaction

2 Create leading customer satisfaction

3 Ensure long-term sustainable economic growth and earnings

4 Demonstrate focused corporate responsibility for both the environment and people

We also call this the quadruple bottom line, which we work with as we strive to implement our action plans and make continuous improvements in our daily work.

To make things concrete, we work with common goals and follow up on each of the four bottom lines through our internal pulse survey, external customer surveys, financial reporting and ESG reporting. In this way, we have a platform for jointly evaluating and celebrating our progress, taking corrective action and setting new goals for our development.

With this approach, we fulfil our purpose and customer promise to "lead new ways" – towards better business and a brighter future for all of us.

Our improvement culture is therefore the key to making the greatest possible difference for everyone around us – and for ourselves and each other as colleagues.

As part of the Mekoprint family, you can therefore expect:

- A development-oriented working environment with exciting career opportunities
- Good work-life balance
- Shared focus on job satisfaction and team collaboration

Curious
Ambitious
Resolute
Responsible

// Mekoprint values

What values characterise our improvement culture and how do we put them into practice?

The improvement culture at Mekoprint will always be lived out in different ways in each team, division and country, but the common ground is our four core values. Since the beginning of Mekoprint's history in 1954, these values have in practice acted as an improvement wheel – including in terms of developing good collaboration. The values, with their respective characteristics below, should be seen as general guidelines for the way we work as a pioneering company in balance:

Curious – with genuine interest

Curiosity is our "spearhead value" that, among other things, drives interest and ideas for our customers, ways to work smarter and more sustainably.

In addition, we are curious to understand and meet each other's differences in a positive and stimulating collaboration.

Ambitious – with high standards

We are ambitious in translating knowledge into new and better processes, solutions and industry standards for what matters.

We strive for daily improvements but remember to involve and align expectations for new endeavours with each other.

Responsible – with clear roles

We are known for delivering on our promises – both internally and externally, with clear roles and responsibilities to succeed as a team.

We acknowledge that errors or delays can occur. But we take immediate corrective action – and focus on the learning that can prevent them in the future.

We value and respect each other's differences as colleagues and all stakeholders around us, from customers to suppliers and partners.

We take responsibility for our own work, a safe and motivating working environment and our shared impact on society.

Resolute – with a high level of delegation

We are resolute with a high level of delegation of responsibility for decisions and execution to both teams and individual colleagues.

That is why we are committed to making things happen as soon as the team involved has agreed on a plan for good collaboration. We do this by continuously aligning expectations and, in a trust-based way, supporting actions, well-being and continuous improvements in the task flow.

We know that speed is a crucial competitive parameter, and a lot needs to be clarified and learnt along the way rather than knowing all the details in advance.

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The values can be brought up in our daily dialogue with each other as needed – for example, by asking:

- Have we been **curious** enough about our customer›s needs?
- Are we being too **ambitious** in our assessment of whether the new technology can fully replace existing technology?
- Can we **be more resolute** when helping our customer in a quality case – and implement a new process while we do it?
- Have we taken sufficient **responsibility** for the best possible onboarding of a new colleague?

In addition, it can be good to bring up the values at a team meeting or an evaluation meeting – to get a shared awareness of everything that is going well and openly help each other with where and how we can improve!

Good triple-A collaboration

In addition to our 4 core values, "good collaboration" is a central part of taking a team-based approach to our improvement culture. Most of what we do is directly dependent on how well we work with each other and the continuous improvements we make together.

At Mekoprint, the responsibility for good collaboration both internally and externally lies with management, but in practice it must be shouldered by all of us in every context. In other words, we all have a responsibility for good collaboration in practice with as much independence as possible.

In order to work to continuously improve on good collaboration, we defined three characteristics that must be present for good collaboration to exist. They all start with an "A", so we call it "triple-A collaboration", with the following characteristics:

Analyse the task – what is the background, purpose, action and expected outcome?

Align the collaboration – how do we help each other with the task at hand, taking into consideration our experience and role?

Agree on follow-up – when and how do we follow up?

To evaluate the status and input for improving on good collaboration, an anonymous pulse survey is conducted up to four times a year on both overall job satisfaction, AAA collaboration with the immediate manager and with each other in the team.

However, the conditions for all the tasks on which we collaborate can change quickly and doubts can arise along the way. That is why it is also important that we are confident in continuously reaching out to each other and making corrections as needed, based on the AAA characteristics. The foundation for good collaboration is thus that we all focus on how we support a safe working environment where we do not hold back on giving each other feedback and input for improvements.

All managers are responsible for evaluating, following up on and improving good AAA collaboration, and we therefore also prioritise time for training and sparring on good leadership at Mekoprint – not least with a focus on creating a safe collaborative environment.

Ethical guidelines

Common ethical guidelines – Code of Conduct

An important part of our purpose and culture is that we can all be guardians of the clear, shared ethical guidelines as a common starting point for our way of being and developing Mekoprint. The ethical guidelines are thus a description of how we behave responsibly, which we have divided into the following three main areas:

Environment – our environmental responsibility
Social – our social responsibility for each other and others around the organisation
Governance – our responsibility for good corporate governance lived out throughout the organisation

This is also known as our ESG-related corporate social responsibility, which we report on in both our overall annual report and in a separate, annual ESG report. The starting point for our corporate social responsibility is the following 17 ethical guidelines, also referred to as our Code of Conduct. Each of the ethical guidelines is further elaborated on in the following sections with the overall policy for each guideline.

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5 ethical guidelines for environmental responsibility

1. We reduce energy consumption and CO2
2. We minimize pollution of air, water and soil
3. We optimize water consumption and recycling
4. We minimize and sort waste for recycling
5. We encourage environmentally friendly materials

5 ethical guidelines for social responsibility

1. We comply with human rights and fair employment
2. We ensure an inclusive and good workplace for all
3. We are committed to physical health & safety
4. We support in case of illness and prevent stress
5. We ensure continuous competence development

7 ethical guidelines for good corporate governance

1. We follow legislation & recommended governance
2. We use management systems and team-based culture
3. We ensure suppliers follow our guidelines
4. We promote freedom of speech & confidentiality
5. We protect information with data ethics & guidelines
6. We accept no type of money laundering, corruption or bribery
7. We speak up about ethical guideline violations

Ethical guidelines for environmental responsibility

Our five ethical guidelines for environmental responsibility are based on an ambition to take the best possible care of nature. We do this by continuously optimising our resource consumption and aim to reduce our environmental impact through best practices. This includes both digitalising administrative processes and optimising our production flow and logistics as close to the customers as possible. In addition, we want to continuously improve our environmental impact and actively work to combat climate change by reducing and neutralising CO_2 emissions by ourselves, our suppliers and our customers.

The work on environmental optimisation is carried out through a certified environmental management system according to the ISO 14001 standard, which ensures targeted actions, follow-up and external evaluation. This also includes an expectation of environmental responsibility on the part of our suppliers, and over 200 of our largest suppliers are evaluated in an annual survey, while selected major or high-risk suppliers are evaluated through an audit.

Mekoprint Group follows and respects the following relevant environmental initiatives and agreements*

- UN Sustainable Development Goals

- UN climate initiative and Sustainable Development Goals:
  - Paris Agreement on Climate Change, UN climate goal
  - UN Sustainable Development Goals

- EU Waste Framework Directive 2008/98/EC

- Regulation (EU) 2019/1021 on persistent organic pollutants (POP)
  - Stockholm Convention, POPs; Persistent Organic Pollutants Regulation

- EcoVadis – Rating/assessing the sustainability of companies
  - Mekoprint Group, EcoVadis rated since 2019

- DS/ISO 14001:2015 Environmental

Overall, our environmental responsibility is specifically related to the following three of the 17 UN Sustainable Development Goals:


*Evaluated and gradually rolled out in new subsidiaries after acquisitions.

Below, see our shared ethical guidelines for environmental responsibility, to which everyone is expected to contribute ideas and input for both continuous improvements and major environmental changes:

We reduce energy consumption and CO2

We aim for power, heating and natural gas consumption to be continuously optimised by all of us on a daily basis, and we work with targeted action plans to use i.a. solar cells and heat pumps in order to neutralise our own CO2 emissions at scope 1 and 2 levels by the end of 2025[*].
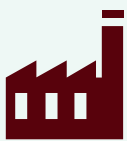
We minimise pollution of air, water and soil

Contamination of soil and groundwater can harm drinking water and our health, which is why it is crucial that we ensure that our wastewater stays below all legal limits for as long as possible. We do this by following regulations in environmental and wastewater permits on the handling and storage of chemicals, by using the best possible treatment processes and by taking anonymous wastewater samples as a basis for continuous optimisation. Air pollution from our industrial facilities is only particularly relevant to Mekoprint's wet coating process, while potential air pollution from other processes is evaluated in connection with major changes in layout and optimisation of air exchange. Soil contamination is not a significant risk at Mekoprint, but we still work to support biodiversity by gradually converting areas around our factories to wild areas and by annual tree planting in areas that are converted to forest reserve. This already covers an area larger than the area of our own factories.

We optimise water consumption and recycling

We do this by closely monitoring our water consumption for processes and cooling, and continuously working to minimise our water consumption by reusing treated water and avoiding all unnecessary
water consumption.

We minimise and sort waste for recycling

Our four divisions have different types and quantities of waste, all sorted and disposed of as more than 40 different waste fractions for recirculation and recycling. To reduce waste, we continuously strive to find more environmentally friendly materials and consumables that can be recycled and thus promote a circular economy. Environmentally hazardous waste from Mekoprint's chemical processes is handled, stored, packaged, declared and disposed of in accordance with the national regulations described in the EU ADR Convention. In line with national legislation and as needed, we utilise an external environmental safety advisor to ensure both ongoing training and compliance with i.a. ADR legislation through annual auditing and reporting.

We encourage environmentally friendly materials

The offering of more environmentally friendly alternatives to existing consumer goods and raw materials varies greatly, but we will increasingly seek out new and more environmentally friendly alternatives from both existing and potential new suppliers. In this way, we can be at the forefront of alternatives for our customers and increasingly act as proactive advisors in relation to our customers' need to develop more sustainable products and processes.

[*]CO2 emissions at scope 1 level are related to the direct consumption of natural gas, district heating and wood chips, while scope 2 is CO2 from electricity production.

In collaboration with the Growing Trees Network, Mekoprint has planted a total of 30,000 trees in Denmark and Ecuador.

Ethical guidelines for social responsibility

Social responsibility has always been a natural part of Mekoprint's culture, with a special focus on being a decent workplace with safe, stimulating and value-creating communities in independent teams. This applies to everything from rights to a joint effort to develop a good working environment with room for differences and the possibility of support where needed in special situations.

Based on the safe working environment, we also deploy resources to help new colleagues get off to a good start, including those who are starting their very first job or who may otherwise be on the fringes of the labour market due to illness, refugee status or disability, or for other reasons.

Similarly, it is important to Mekoprint that there is a proper working environment at our suppliers, for which we have described expectations in a Partner Code of Conduct that must be accepted or supported by similar UN-recognised guidelines for all suppliers with deliveries to Mekoprint totalling in excess of DKK 150,000.

Finally, we have a special long-term focus on the development of children and young people with growing local collaboration on job opportunities in an industrial company as a career path – and we also support local initiatives with volunteers who make a particular effort for children and young people with challenges related to special needs.

Mekoprint Group complies with and respects the following relevant initiatives and agreements*

- United Nations (UN) Global Compact
  – Mekoprint Group, member of the UN Global Compact since 2017

- UN international human rights law:
  – The Universal Declaration of Human Rights.

- UN Guiding Principles on Business and Human Rights:
  – Guidelines for responsible business conduct and compliance with human rights principles.

- International Labour Organization (ILO)
  – United Nations Organisation for Labour and Social Security

- Working Environment Act, Act no. 2062 of 16/11/2021
  – Danish legislation on safe and healthy working environment (Danish Working Environment Authority)

- DI's Diversity Pledge
  – The Confederation of Danish Industry's diversity pledge to promote diversity, inclusion and equality. Mekoprint has signed this pledge.

- The UK Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

- General Data Protection Regulation (GDPR) (EU) Regulation 2016/679

- EcoVadis – Rating/assessing the sustainability of companies
  – Mekoprint Group, EcoVadis rated since 2019
  – The assessment covers Environmental, Social, Governance, Labour, Ethics and Sustainable Procurement.

- DS/ISO 45001:2018 Health & Safety

- The Dodd-Frank Wall Street Reform and Consumer Protections Act
  – RMI_CMRT - Conflict Mineral (3TG)

- Regulation (EU) 2017/821
  – EU Conflict Minerals Regulation (3TG)

Overall, our social responsibility is specifically related to the following two of the 17 UN Sustainable Development Goals:
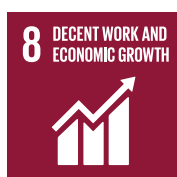
*Evaluated and gradually rolled out in new subsidiaries after acquisitions.

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We comply with human rights and fair employment

The starting point for a safe working life is a fundamental respect for rights. Therefore, we respect and support all internationally recognised human rights and the UN Guiding Principles for Business on fair employment practices and labour standards. We want to support social dialogue with internal dialogue forums, general freedom of association and requests for membership of professional organisations. Being a fair employer is also about offering a competitive salary, which should be the same for everyone doing the same job with the same qualifications, attitude and performance. In addition, we comply with all international labour standards. It must be a hallmark of Mekoprint that everyone endeavours to maintain a good work-life balance.

We ensure an inclusive and good workplace for all

When we look around Mekoprint, we each contribute our own distinctive competences, experience, background and thoughts about the world. We each expect to be seen for who we are and recognised for the contribution we make to the community. Our diversity makes us strong. Diversity and inclusion are key to a culture of improvement that fosters a strong competitive edge. Equal opportunities regardless of ethnic origin, gender, age, sexual orientation, disability, political beliefs and marital status are therefore crucial parameters for us to continue to be a good and successful company in the future. In particular, we want to achieve a more equal gender distribution in management positions, so in every recruitment process we aim to have one woman among the last three candidates. This gives us an increased focus on the shared task we have in society to create better opportunities for female leaders. We cultivate an equal, safe and positive psychological working environment that is created with a clear framework, roles and responsibilities. At least once a year, we combine the anonymous pulse survey with questions that evaluate the perception of inclusion, diversity, equal treatment and communication in general. Based on the survey, improvement initiatives are initiated as needed – in addition to the ongoing improvement of collaboration and the psychological working environment.

We are committed to physical health & safety

Everyone at Mekoprint must take the physical working environment seriously so that we can ensure the best possible conditions for maintaining a high level of health and safety. We want to inspire each other to improve both health and safety – beyond localised safety requirements, instructions and applicable legislation. Among other things, this is achieved by implementing and certifying working environment efforts in accordance with ISO 45001 (health and safety) in all Mekoprint companies. Our ambition is for everyone to leave the company as healthy as when they arrived. Both at the end of each workday and at the end of their employment under the following headings:

- Everyone can perform their work in a safe and healthy way
- We prevent the working environment from causing physical and mental decline, occupational injuries and absence
- We ensure healthy and attractive workplaces that focus on developing competences and well-being

We support in case of illness and prevent stress

It is important that we work together to retain our colleagues and ensure a safe working environment – even if an employee falls ill. Therefore, a sickness absence interview is held if a colleague has been sick for two weeks or more within a six-month period. The purpose of the interview is to clarify what can be done together to ensure a safe and good working environment under the given circumstances – including the impact on immediate colleagues – and opportunities to reduce sickness absence in the future. When illness strikes, we all have a responsibility to help each other. Should an employee be affected by stress or other forms of life crisis, we step in with offers of help, such as counselling or other services as agreed with the individual. We want to get involved early on and also provide preventative help so that the individual can regain a healthy mental balance. We do not differentiate between personal and work-related stress – our primary focus is on a healthy and safe return to a balanced working life.

We ensure continuous competence development

As a development-oriented company, everyone must be motivated to continuously learn new things and seek out improvements that also require innovation and the development of new competences. To support this development, follow-ups are conducted at least once a year, either in each team or individually, to evaluate new competence development needs and determine action plans – based on company needs and personal wishes. In terms of learning, the focus is on an effective and motivating combination of both peer-to-peer training with a colleague and external continuing education, opportunities for which everyone is encouraged to seek out. In addition, we want to take special responsibility for young people and recent graduates with as attractive an apprenticeship or workplace as possible. We aim to contribute to the surrounding community by giving young people a good start to their working life, and we want to invest in educating more people than we are sure to have jobs for after graduation. It is important to us that young people at Mekoprint experience being part of the community and feel they are also contributing to the company's development.

Ethical guidelines for corporate governance

Good corporate governance is fundamentally about ensuring credible management and development of Mekoprint with sufficiently clear frameworks and controls for all our activities across and within each country, location and customer/product area. The Board of Directors has overall responsibility for corporate governance based on external guidelines for taking into consideration both investors and all other stakeholders in and around the organisation. This also includes evaluating and following up on Mekoprint's strategic and business risks as well as the quality of management decisions and financial reporting.

From left to right: Anders Kold, CEO and Torben Jensen, CFO

Mekoprint Group complies with and respects the following relevant initiatives and agreements:

- UN Guiding Principles on Business and Human Rights:
  – Guidelines for responsible business conduct and compliance with human rights principles.

- OECD Guidelines for Multinational Enterprises
  – Responsible business conduct in the areas of human and labour rights, international environmental standards, competition, taxation and corruption.

- OECD's Due Diligence Guidance for Responsible Business Conduct

- The Danish Financial Statements Act
  – The Danish Financial Statements Act
  – Rules for preparing the company's annual financial statements according to Danish law

- Governance Mekoprint Group, signed Mekoprint Board

- Mekoprint Holding Corporate Governance Report

- Mekoprint Group Holding Annual Report

We all have an influence on the practice of good corporate governance, so we should all be aware of the following guidelines, which each of us must live out depending on our role and responsibility:

We follow legislation & recommended governance

Everyone is obliged to seek out knowledge about statutory regulations, guidelines and conventions in their field of work. All managers are responsible for ensuring compliance with applicable laws and reporting any violations in a timely manner. Mekoprint Group's Board of Directors annually evaluates external recommendations for good corporate governance and ensures implementation of new significant recommendations, making propriety and transparency in everything we do our hallmark. As part of the recommendations, we have considered which customers we would like to work with and draw the line at companies that do not significantly align with our own ethical guidelines. We have a strong preference towards customers and suppliers that improve global sustainability and quality of life, but we also support necessary defence related products that are approved within the NATO alliance.

We use management systems and team-based culture

All Mekoprint, companies work on the basis of a certified ISO 9001 management system with differences related to the needs of the individual product areas – including risk management, compliance with local legislation and guidelines from external partners. Each management system must be supported by all of us through our team-based improvement culture, driven by our four core values across all Mekoprint companies and activities. As mentioned, we cultivate good collaboration both internally and externally based on the AAA principles to live out and improve our standards for increased value creation for everyone in and around Mekoprint.

### We ensure suppliers follow our guidelines

All suppliers with annual deliveries of more than DKK 150,000 must accept Mekoprint Group's Partner Code of Conduct, while all suppliers and business partners must follow locally specified guidelines for efficient and safe collaboration. To ensure awareness and focus on improvements among major suppliers, an annual Sustainable Supplier Assessment of all suppliers with annual deliveries of more than DKK 150,000 is conducted for follow-up in each division. Our external collaboration is based on mutual respect, so all suppliers and business partners should feel that we treat them as we would like to be treated by our customers. Among other things, this includes timely payment and a focus on continuous feedback on our part to mutually improve the collaboration as needed. If suppliers do not comply with applicable requirements, their collaboration with Mekoprint may be terminated.

We promote freedom of speech & confidentiality

At Mekoprint, we recognise every person's right to freedom of expression. Everyone at Mekoprint has the right to participate as individuals in political processes and interest groups in ways that are in accordance with national legislation. However, it is expected that it should be made clear that the views expressed are personal and do not represent the views of Mekoprint. All communication from Mekoprint as a company must comply with legislation for responsible marketing communication – including personal communication in writing and speech by all representatives of Mekoprint.
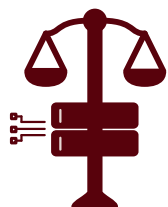
We protect information with data ethics & guidelines

All information storage and data processing at Mekoprint must at all times comply with applicable legislation and guidelines agreed with customers and business partners. This includes, in particular, safeguarding sensitive personal data in accordance with our GDPR policy and ensuring an adequate level of IT security for all information by following the guidelines for secure IT operations. We actively work with data security, including cyber security guidelines that include self-assessment and testing of security against internal and external threats. In the event of a data breach, the IT contingency plan is activated according to procedures in the formal management system if an incident cannot be handled within the framework of normal processes and workflows. All use of data must be related to our Data Ethics policy and training in IT-security best practice incl. phishing is mandatory for all.

We accept no type of money laundering, corruption or bribery

All forms of potential conflicts of interest related to personal relationships, secondary employment and/or unpaid representation of interests must be avoided by involving independent third parties in Mekoprint. We fight corruption, money laundering, tax evasion, market abuse, circumvention of economic sanctions and insider rules as well as improper payments or favours to or from Mekoprint. Any incidents will be handled with management involvement. We do not accept or offer gifts that go beyond what is considered reasonable in the ordinary course of business. Such gifts may not exceed DKK 750, unless it is for very special recognition-worthy events or purposes that can be approved by a member of the senior management group. No gifts may be of such a nature that they can be considered inappropriate or otherwise damage Mekoprint's reputation or trust in the company, our colleagues or business partners. It is strictly prohibited to accept or offer gifts of money, including gifts of cash or securities. If external parties reimburse an employee's accommodation and/or travel expenses, prior authorisation from their line manager is required. Mekoprint never supports political causes, public authorities, labour organisations, religious causes and radical movements – nor does Mekoprint support associations or activities that in any way use illegal methods, are unethical or endanger the environment, health or safety.

We speak up about ethical guideline violations

If an employee finds that there is significant doubt or suspicion about compliance with legislation and agreed internal and external guidelines, the "Speak-Up" principles in the next section must be followed.

SpeakUp – Mekoprint´s whistleblower solution

Why SpeakUp?
At Mekoprint, we are striving to maintain a corporate culture based on openness, where anybody can freely report any suspicions of breaches of company policies, potential crime, or unethical behavior. This goes for any case connected to employees, management, suppliers, customers, or others who are connected to Mekoprint.

Employees are often first to discover problems or unethical behavior in the workplace. Any problem shall by default be reported to the immediate manager or any other senior manager. Non-employees shall report to their contact at Mekoprint, or to any member of management. However, we do recognize that it may be difficult to bring forward information concerning colleagues, management, or business partners due to loyalty, fear of revenge, or other personal reasons. But it is crucial for Mekoprint that this information is brought forward. To ensure this, we have initiated a whistleblower system, operated by the accounting company Beierholm.

Using the system, individuals, who are in good faith, can confidentially report any problem, crime, or issue. This includes cases that may cause financial loss or impact the company's image negatively.

Who can file a report?
Any person who is working for Mekoprint can file a report. This includes employees, temps, interns and others who work in the company on a daily basis.

How to file a report?
Reports are filed through a secure and encrypted website. The website can be accessed from a PC, a smartphone, or any other device able to browse the internet, via this address:
whistleblower.beierholm.dk/portal/mekoprint

How are reports handled?

After filing a report, the whistleblower shall within 7 days receive confirmation that the report has been received. The confirmation is sent to the secure mailbox of the whistleblower.

On reception of a report, a preliminary screening is performed by unbiased case managers at Beierholm. Based on this process, one of the following will happen next:

1. If the report implies a mainly internal case, the report will be handed over to the whistleblower unit at Mekoprint for internal investigation.

   The whistleblower unit of Mekoprint consists of the following person(s):

   CEO Anders Kold
   HR Development Director Marianne Reenberg
   Division director Lars Laungaard Rasmussen

   Only members of the whistleblower unit can know the identity of the whistleblower and any other personal information. If others need to be involved (ie. for investigating the case), the whistleblower must approve that information about his identity is shared.

   If the report implies a person who is a member of the whistleblower unit, the case will be submitted to the other members of the whistleblower unit and handled without the involvement of the reported member.

2. If the contents of the report are of a very serious nature, or points at potential crime, the case may be submitted for further legal evaluation. This must be approved by Mekoprint. On request, Beierholm may initiate contact with relevant legal advisors. All costs connected to legal consultancy or investigation are at the expense of Mekoprint.

3. If Beierholm concludes that the case described by the report is not covered by this policy, is clearly unfounded, or if the report is submitted by mistake, the report will be turned down. In this case, the whistleblower will be encouraged to raise the issue internally if desired. The company will not be made aware of such cases.

The whistleblower will always be kept informed about the investigation of the case and will receive feedback as defined by the law within 90 days.

Beierholm retains data for a period of five years, after which all data is deleted from Beierholm systems. Mekoprint and the whistleblower may at any time request the immediate deletion of data. Any data handled by Beierholm is covered by the privacy policy.

Confidentiality and protection against retaliation

Anybody listed under "Who can file a report?", who submits a report in good faith, is protected under the whistleblower legislation. Employees who try to perform retaliation against a whistleblower, will be sanctioned, and may be dismissed from the company.

Collaboration
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