

Mega Flex A/S – Code of Conduct 2026

Code of Conduct

2026

As a responsible actor with a strong position in the construction industry in Denmark and across a number of international markets, **MEGA FLEX A/S (MFX)** seeks to contribute to sustainable development within construction and society in general.

Our operations are based on a business strategy founded on respect for our employees and for the environment, setting the framework for how we conduct our business. We wish to distance ourselves from violations of human rights, corruption, bribery, and other improper business practices. Accordingly, we impose high standards on our own conduct and seek to influence our business partners to respect principles of sound business ethics.

In addition to complying with applicable legal requirements, we respect the ten principles of the **UN Global Compact** and thereby confirm our commitment to ethical conduct based on integrity, fairness, and social responsibility. We aim to ensure that internationally recognized human rights are respected by our business partners and suppliers.

The purpose of this Code of Conduct is to ensure that the Group's suppliers conduct their business in accordance with internationally recognized minimum standards for human rights, labor conditions, and the environment.

General Requirements

The principles of ethical conduct set out the minimum standards that suppliers to the Group are expected to meet. The Group acknowledges that compliance with these standards is a dynamic process rather than a static one and encourages suppliers to continuously improve their working conditions. Suppliers to the Group must also meet certain requirements relating to quality, occupational health and safety, and environmental protection. These requirements will be communicated separately to suppliers.

We expect the principles expressed in this Code of Conduct to apply to suppliers, parent companies, subsidiaries, affiliated companies, and all other parties with whom we cooperate, including employees, subcontractors, sub-suppliers, and other third parties. Furthermore, we expect suppliers to ensure that this Code of Conduct is communicated to all their employees and subcontractors in the local language and in a manner that is understood by all.

Suppliers are expected, as a minimum, to establish clear objectives for compliance with the standards contained in this Code of Conduct. MFX may supervise and verify that appropriate management systems are in place to ensure compliance with these principles. Failure to comply may affect a

supplier's future business relationship with the Group. MFX, or a third party appointed by the Group, may conduct on-site reviews or audits of the supplier's facilities and those of its subcontractors to assess progress in relation to these principles.

All principles contained in this Code of Conduct are equally important, regardless of the order in which they are presented.

Any inconsistency between the provisions of this Code of Conduct and national legislation or other applicable rules will be assessed by the Group in consultation with the supplier. Suppliers must be able to document their compliance with this Code of Conduct and must immediately inform the Group if any non-compliance is identified. In cases of non-compliance, the supplier will be required to commit to remedying the issue within a deadline determined in writing by MFX.

The Group is committed to supporting and continuously improving principles of sound business conduct in cooperation with its suppliers and to assisting them in complying with this Code of Conduct. However, the Group reserves the right to terminate agreements if a supplier determines that compliance with these requirements is impossible, or if the supplier materially breaches or repeatedly violates this Code of Conduct.

Specific Requirements

Child and Young Worker Labor

1. Minimum Age Requirements

The supplier must not engage in or benefit from the use of child labor. The minimum age for employment must not be lower than the compulsory school age and in any event not lower than 15 years (or 14 years where permitted by national law in accordance with the International Labour Organization (ILO) exception for developing countries).

2. Remedial Education

If the supplier becomes aware that it employs children of school age, the supplier must ensure that the children receive remedial education instead of being dismissed. Such education must include access to schooling and financial support and must be decided in consultation with the child and their family or guardians.

3. Hazardous Work

The supplier must refrain from employing young workers (under 18 years of age) in work that may jeopardize their health, safety, or morals.

Forced Labor

1. Forced Labor and Freedom of Movement

The supplier must not engage in or benefit from any form of forced labor, including debt bondage, prison labor, slavery, servitude, or human trafficking. Workers must have freedom of movement throughout their employment.

2. Retention of Identification Documents

The supplier must not retain employees' identification documents, travel documents, or other important personal papers.

Non-Discrimination

The supplier must not engage in or support discrimination based on race, color, gender, language, religion, political or other opinion, caste, national origin, social background, property, birth, trade union membership, sexual orientation, health status, family responsibilities, age, disability, or any other characteristic.

Employees must not be subjected to corporal punishment, threats of violence, or physical, sexual, psychological, or verbal harassment or abuse in the workplace or in work-related situations. Employment decisions, including hiring, remuneration, benefits, training, promotion, disciplinary actions, termination, retirement, or other employment-related decisions, must be based on relevant and objective criteria.

Freedom of Association

1. Right to Organize and Collective Bargaining

The supplier must recognize employees' right to choose whether to join or establish organizations, including labor organizations.

2. Restrictions on Trade Unions

Where trade unions are not permitted by law or only state-authorized organizations are allowed, the supplier must facilitate and not hinder alternative lawful means that allow employees to assemble independently to discuss work-related matters and to establish forums through which work-related concerns may be raised with management.

Human Rights

The supplier must consult stakeholders whose human rights may potentially be affected by the supplier's operations, including engaging in dialogue with the local community. The supplier must seek to respect internationally recognized human rights where conflicting legal requirements exist.

Occupational Health and Safety

1. Health and Safety Principles

The supplier must ensure that employees are provided with a safe and healthy working environment, including protection against fire, accidents, and exposure to hazardous substances. Adequate occupational health and safety policies and procedures must be established and followed.

2. Training and Protective Equipment

The supplier must ensure that employees receive all necessary protective equipment and training required to perform their work safely and responsibly.

Employment and Working Conditions

1. Wages

The supplier must compensate employees in accordance with applicable laws and regulations concerning wages, including minimum wages, overtime pay, and legally mandated benefits. Disciplinary wage deductions must comply with local law. Wage structures must be clearly and timely communicated to employees. The supplier must not make wage deductions as a disciplinary sanction or impose other wage reductions not required by law. All disciplinary measures must be documented.

2. Working Hours

The supplier must ensure that working hours do not exceed the maximum limits set by local legislation. A standard workweek should not exceed 48 hours, including overtime, except in emergencies or exceptional circumstances. Employees must be granted at least one day off for every seven-day period.

3. Protection of Personal Data

The supplier must respect employees' right to privacy when collecting, storing, or processing personal data or when implementing employee monitoring practices.

Accidents and Health

1. Workplace Accidents and Health Emergencies

The supplier must establish and maintain emergency procedures to effectively prevent and address crises and workplace accidents that may impact the surrounding community.

Environmental Protection

1. Legal Compliance

The supplier has a special obligation to minimize its environmental footprint and to act responsibly in relation to its surroundings. The supplier must comply with all applicable environmental laws in the host country and remain continuously informed of relevant environmental legal requirements affecting its activities, products, and services. Compliance must be ensured through training, awareness, operational controls, and monitoring.

2. Environmental Management

The supplier must systematically work to prevent, minimize, and remediate any adverse environmental impacts arising from its activities, products, or services by acting proactively and managing environmental aspects responsibly. Continuous improvement in environmental performance must be demonstrable with regard to significant environmental aspects.

Business Ethics – Anti-Corruption

1. Ethical Standards

The supplier must uphold the highest ethical standards and act with integrity, comply with local laws, and refrain from all forms of corrupt practices, including extortion, fraud, and bribery.

2. Improper Business Conduct

The supplier must not give or receive improper advantages or benefits that could be perceived as inappropriate compensation for obtaining, retaining, or referring business, or for securing any other improper advantage. Improper benefits may include cash, gifts, entertainment, travel, or other services.

Political Neutrality and Ethical Responsibility

At **MEGA FLEX A/S**, we are fully committed to maintaining a politically neutral stance in all aspects of our operations. This means that we do not support, promote, or engage in collaborations associated with political agendas, parties, or ideologies. Our work is based solely on professionalism, integrity, and respect for universal human rights.

As part of our internal compliance policy, we have chosen not to undertake assignments for military organizations, including defense institutions, arms manufacturers, or other entities directly involved in armed conflict. This decision is rooted in ethical considerations and reflects our desire to contribute to a more peaceful and sustainable world.

We believe that transparency and accountability are the cornerstones of a trustworthy partnership, and we aim to be clear about the values that guide our business. We appreciate your understanding and look forward to continuing to deliver solutions built on quality, respect, and responsibility.