

## e-Boks Labour Code of Conduct

## 1. Objective

This Labour Code of Conduct is primarily for internal use, yet it is also made externally available to make our commitment and expectations clear to everyone, including our contractors and suppliers. The e-Boks Labour Code of Conduct describes expected minimum requirements regarding e-Boks employees' human rights at work, in line with e-Boks' Human Rights commitment.

## 2. Applies to

The e-Boks Labour Code of Conduct applies to all e-Boks employees, as well as e-Boks contractors and suppliers. Managers and employees have a dual responsibility to ensure the code is implemented and followed.

## 3. Our Commitment to Human Rights at Work

e-Boks supports the universal principles of the UN Global Compact. We are committed to meeting our responsibility to respect human rights as defined by the UN Guiding Principles on Business and Human Rights, this means the rights set out in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We pay special attention to employees' working conditions, their right to organize and bargain, their health and safety, respect for individuals and their privacy, and providing an environment where all employees can be themselves, free from discrimination and harassment, and with equal opportunities for development. We comply with laws and regulations where e-Boks does business and adopt and apply international standards where laws are less stringent. The e-Boks Human Rights Commitment is manifested in the e-Boks Code of Conduct. Any employee with concerns regarding the human rights at work may raise these through our employee mechanisms for raising workplace-related grievances.

## 4. We Speak Up

e-Boks encourages an open and honest culture of trust, curiosity, and good judgment. Part of building a culture of trust is speaking up about cultural and business-related issues and other relevant concerns. If you for example are unsure of how our standards or values apply to a given situation, if you have experienced offensive behavior towards a colleague or yourself, or you suspect a potential compliance deviation, you are responsible for raising it through the appropriate channels.

## 5. How to Report a Concern

If you feel comfortable, talk to your manager about it. Such conversations may easily remedy many issues. If you are not comfortable with this or appropriate action is not being taken to address an issue, please reach out to the People and Culture team. You also have the option to go to the chosen working environment representative to report issues or just to have a helpful, clarifying chat.

Another option is to report a concern through e-Boks whistleblower system that can be done externally on the website [here](#) and internally on the platform at Boksy – see link here Whistleblower (sharepoint.com). The purpose behind providing this platform, run by an external independent party, is to give all employees access to report a concern with secured anonymity. The whistleblower function can also be used by third parties.

## **6. Labour Code of Conduct in General**

The e-Boks Labour Code of Conduct covers the following rights at work: Working Hours, Living Wage, Leave, Employee Privacy, Equality/ Harassment/ Discrimination, Freedom of Association and Collective Bargaining, Forced and Bonded Labour, Child Labour and Young Workers and Grievance Mechanisms. Below, each of these rights is explained in detail.

### **6.1: Working Hours**

6.1.1: We strive to ensure that there is sufficient time for employees to combine work with family and other obligations in respect for work-life balance.

6.1.2: We work to ensure decent working hours in accordance with law and collective agreements.

6.1.3: In job functions requiring work outside of standard hours, or where the working week requires more than 37 hours of work, e-Boks has entered into special contractual agreements where special compensation schemes apply.

### **6.2: Living Wage**

6.2.1: e-Boks requires that wages shall be paid in compliance with national laws and meet the legal minimum standards. Wages must be sufficient to meet the basic needs of the employees. Deductions from wages must be transparent and must never be used as a disciplinary measure.

### **6.3: Leave**

6.3.1: We provide rest-periods, breaks, and leave for all our employees. Leave includes vacation and holiday, sickness, compassionate, and parental leave.

6.3.2: e-Boks offers parental leave in accordance with Danish Law.

### **6.4: Employee Privacy**

6.4.1: We respect the private lives of our employees and secure the right to privacy whenever personal employee data is gathered or the workplace is monitored. Personal employee data should be processed lawfully and fairly, and only for reasons directly relevant to their employment. It should never be used in a manner incompatible with the original purpose.

### **6.5: Equality, Harassment, and Discrimination**

6.5.1: e-Boks will not engage in any form of discrimination based on race, sex, religion, political affiliation, caste, national or social origin, sexual orientation, family responsibilities, age, disability, or other distinguishing characteristics. Our employees and managers are expected to provide a workplace free of discrimination, harassment, and bullying. No one should be discriminated against or harassed for any reason or under any circumstances. The workplace should be free of threats and insults.

6.5.2: Hiring, remuneration, benefits, training, advancement, discipline, termination, retirement, and any other employment related decisions must be based on relevant and objective criteria.

## **6.6: Freedom of Association and Collective Bargaining**

6.6.1: e-Boks respects the right of workers to associate freely, form and join workers' organisations, seek representation and bargain collectively, as permitted by and in accordance with applicable laws and regulations.

6.6.2: e-Boks emphasizes the legal right of employees to join or to refrain from joining unions or other associations of their own choosing.

## **6.7: Forced and Bonded Labour**

6.7.1: e-Boks will not participate in, or benefit from, any form of forced or involuntary labour (e.g., forced prison labour). All work must be voluntary, and the workers must have the freedom of movement during the course of their employment and be free to leave work or terminate their employment with reasonable notice.

## **6.8: Child Labour and Young Workers**

6.8.1: e-Boks does not accept the use of child labour.

6.8.2: e-Boks accepts the use of legitimate apprenticeship programmes provided that such programmes are in full compliance with applicable laws and regulations. e-Boks disapproves of hiring young workers (below 18 years of age) to perform any type of work which is likely to jeopardise their health, safety, and wellbeing.

## **6.9: Health and Safety**

6.9.1: e-Boks strives to provide a safe, health promoting and family-friendly working environment in compliance with all applicable laws and regulations for all employees. Adequate health and safety policies and procedures must be established and followed. Employees must be provided with the protective equipment and training necessary to perform their tasks safely.

6.9.2: The e-Boks Working Environment Board is charged with ensuring that workplace health and safety remains a focus area and that a Health & Safety Workplace Assessment (WPA) is conducted at least every third year unless significant changes to the work environment occur. The WPA assesses health and safety standards and seeks individual input from employees pertaining to their physical and psychological working environment. Findings are communicated to the Management Board and to all employees, and remedying action is taken.

## **6.10: Development**

6.10.1: e-Boks believes in the joint employee-manager responsibility to foster an environment that promotes personal development and performance in alignment with company strategy and the individual needs of the employee. Every employee has the right to a personal development plan that is followed-up upon regularly by both employee and manager.

## **6.11: Non-Compliance**

6.11.1: e-Boks will not tolerate non-compliance with this Labour Code of Conduct, whether due to conscious action, complacency, indifference, or lapse of ethical judgement. Corrective action must be taken immediately when non-compliance occurs / have been made known.

## **6.12: Grievance Mechanisms**

6.12.1: Managers and employees can raise concerns about non-compliance with the e-Boks Labour Code of Conduct in the following ways: Raise concerns with their line-manager; raise concerns with the e-Boks People and Culture Team; raise concerns with an e-Boks working environment representative; report their concerns with secured anonymity through the whistle-blower platform. This function can also be used by third parties.

## **6.13: Corrective Action**

6.13.1: Management action is dependent on the severity of the non-compliance, including whether it was an issue of accidental human error, negligence or a deliberate – and worst case unlawful – breach. Action taken ranges from capturing and learning from mistakes for continuous improvements, to verbal and written warnings to dismissal and legal action. e-Boks cultivates a speak up culture, where we learn from our mistakes.

## **6.14: Monitoring/Records of Documentation**

6.14.1: As part of e-Boks HR, legal and compliance system, appropriate records are maintained to demonstrate compliance with the requirements of the e-Boks Labour Code of Conduct.

6.14.2: As part of e-Boks UN Global Compact Communication on Progress (CoP), any confirmed whistle-blower reports and serious code of conduct non-compliance are reported to stakeholders on an annual basis.

## **6.15: Code of Conduct and Procedures**

6.15.1: In addition, we have several procedures, guidelines, commitments, and code of conducts for respecting and promoting the rights of our employees, such as:

- e-Boks Code of Conduct
- Human Rights commitment
- Labour Rights commitment

- Employee Handbook
- Information Security and Data Privacy Policy
- Health & Safety Work-Place Assessment
- Great Place To Work annual survey
- eYou/People Development Dialogues
- Whistleblower platform

## **7. Human rights in the supply chain**

The e-Boks Labour Code of Conduct also covers e-Boks contractors and suppliers. All e-Boks suppliers must maintain appropriate records to demonstrate compliance with the requirements of this Labour Code of Conduct. Records and documentation must be available to e-Boks upon request at any time with reasonable notice. e-Boks reserves the right to conduct second-party audits by our internal auditing team or third-party audits to monitor and ensure proper compliance with this Labour Code of Conduct.

In addition to meeting the provisions of this Labour Code of Conduct, compliance with national laws, rules, and regulations as well as other applicable standards is required. Conflicts between the provisions of this Labour Code of Conduct and national laws or other applicable standards, shall be evaluated by e-Boks in cooperation with the supplier in order to establish the most appropriate course of action. If any conflicts are detected, the supplier must inform e-Boks immediately.

## **8. Questions**

Questions regarding e-Boks Labour code of Conduct can be directed towards the company's legal department

Contact info

Carina Bansholt Oxfeldt, Group General Counsel

Mobile: +45 5211 5111

e-mail: [cbo@e-boks.dk](mailto:cbo@e-boks.dk)

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