

Code of Conduct



Last updated: May 2026

FJERNVARME FYN

Code of Conduct

Introduction and scope

As an important player within energy supply in Denmark, we have a significant social responsibility and play a crucial role in the green transition - both now and in the future. We therefore conduct our business with a high level of ethical integrity in all aspects of our business.

This Code of Conduct (hereinafter CoC) is intended to ensure that we act responsibly, transparently and with respect, both internally and externally. We expect all employees and business partners to know and comply with our CoC. Fjernvarme Fyn will continuously support the understanding and implementation of the CoC through dialogue, guidance, and cooperation with our business partners.

Employees and business partners are expected to demonstrate social responsibility by identifying, addressing and taking responsibility for the impacts arising from or associated with their own activities or activities in their supply chain.

Legislation and international standards

We base our work on internationally recognised standards:

- UN Guiding Principles on Business and Human Rights (UNGPR)
- OECD Guidelines for Multinational Enterprises
- Global Compact's 10 principles for responsible business conduct
- UN Universal Declaration of Human Rights (UDHR)
- European Convention on Human Rights (ECHR)
- ILO core conventions (29, 87, 98, 100, 105, 111, 138, 155, 182 and 187)

- UN Convention against Corruption
- UN Convention on the Rights of the Child

Applicable legislation must be complied with as a minimum in all activities.

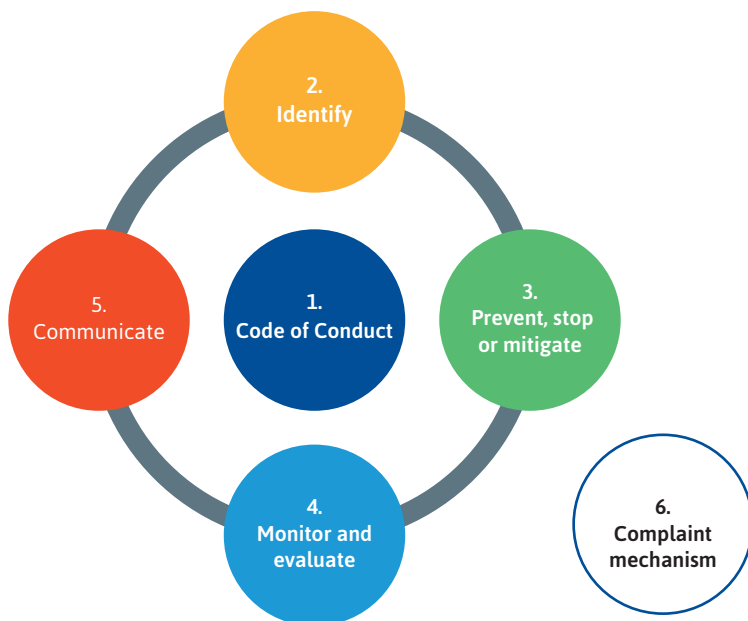
Due Diligence for responsible business conduct

Fjernvarme Fyn works in accordance with the principles of the International Minimum Standard for Responsible Business Conduct (UNGPR/OECD) and works to promote human rights, labour rights, climate responsibility, environmental protection, and anti-corruption. Our work is reported in the company's ESG report. We conduct ongoing risk assessments to identify, prevent and mitigate potential and actual adverse impacts on people, the environment, and society.

We work systematically with follow-up, documentation, and reporting of CoC compliance, both internally and externally. In the event of confirmed or potential breaches of the CoC, a dialogue is initiated to identify and implement corrective actions, which are then followed up on.

If there is suspicion of a breach of Fjernvarme Fyn's CoC, unethical or illegal conduct or other serious concerns, this can be reported freely and confidentially to our whistleblower scheme: www.fjernvarmefyn.dk/whistleblower/

Fjernvarme Fyn ensures that reports are handled confidentially and without risk of reprisals. You can also always contact us by writing to kontakt@fjernvarmefyn.dk or calling +45 65 47 30 00.



Social conditions and human rights

Fjernvarme Fyn respects and promotes human rights in accordance with the UN Universal Declaration of Human Rights (UDHR) and the European Convention on Human Rights (ECHR). We conduct ongoing assessments to identify and address significant risks of adverse impacts – both internally and within business partners' value chains.

- We do not accept any form of forced labour, child labour or human trafficking.
- We do not accept any form of discrimination, including based on gender, race, religion, age, physical or mental disability, sexual orientation or other status – neither directly nor indirectly.
- We do not accept any form of violence, threats, harassment or sexually offensive behaviour in the workplace.

- A safe and healthy working environment, both physically and mentally, is a top priority.
- The minimum age for employment adheres to local legislation and international standards.
- All employees must have a valid employment contract, and wages must be paid on time and in accordance with applicable legislation and collective agreements.

We respect and adhere to the fundamental labour rights set out in the UN Global Compact, and expect our business partners to do the same. To ensure proper working conditions, Fjernvarme Fyn has introduced a labour clause that applies to all collaborations and contracts relating to construction work and services. This clause helps ensure that the work is carried out under responsible and proper conditions.

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Environmental and climate responsibility

Fjernvarme Fyn complies with applicable environmental legislation and ensures that the necessary environmental approvals, permits, and certifications, including ISO 14001, are up to date and observed, and continuously implements improvements.

We are committed to taking responsibility for our climate and environmental impacts. Our efforts include energy-efficient operations, supported by an ISO 50001 Energy Management certification, as well as an ongoing transition to renewable energy sources. We prioritise the preservation of biodiversity and the use of the best available technology – both in our own processes and in our work with our suppliers and business partners. Through these measures, we strive to reduce our overall climate footprint.

To reduce our climate impacts and ensure responsible operations throughout the value chain, we expect our suppliers and business partners to:

- Have both the ambition and the ability to prevent, identify, and address environmental and climate-related risks and impacts
- Actively work to reduce CO₂ emissions and improve energy efficiency
- Integrate sustainable and innovative solutions into their production, processes and products
- Comply with applicable environmental legislation and international standards – and be able to document this upon request from Fjernvarme Fyn
- Carry forward the same environmental principles to their own subcontractors

Fjernvarme Fyn recognises that the level of climate action varies and thus prioritises dialogue and cooperation over sanctions as

the path to improvement.

As a result, we encourage open and ongoing dialogue about new, sustainable initiatives that may contribute to more climate-friendly solutions at both Fjernvarme Fyn and our business partners.

Responsible business conduct and anti-corruption

At Fjernvarme Fyn, we are dedicated to maintaining high ethical standards and integrity in all aspects of our business. We have zero tolerance for any form of corruption, bribery, extortion, fraud, money laundering and tax avoidance, whether offered or received. Identification of such matters may, depending on the circumstances, lead to suspension or termination of the contract entered into.

We expect our suppliers and partners to demonstrate transparency and openness, including providing relevant documentation where necessary, as part of responsible business conduct and in accordance with the principles of anti-corruption (the UN Convention against Corruption and the OECD principles for responsible business conduct).

Fjernvarme Fyn does not accept gifts or benefits that may influence or be perceived as influencing our professional judgements.



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Follow-up, reporting and right to complain

Fjernvarme Fyn places emphasis on openness and transparency in communication, collaboration and reporting to our company, including with regard to working conditions, climate and environmental conditions, and any breaches of this CoC.

To ensure a safe reporting process, we have a whistleblower scheme through which serious suspicions of breaches of the CoC can be reported anonymously, including, but not limited to, bribery, extortion, embezzlement, theft, harassment, or other irregularities.

The whistleblower scheme can be accessed on Fjernvarme Fyn's website here:

www.fjernvarmefyn.dk/whistleblower/

Reports can also be made by writing to kontakt@fjernvarmefyn.dk or by calling +45 65 47 30 00, though this is not anonymous.

If there is suspicion of, or confirmation of, breaches of our CoC, we expect to be informed immediately and for appropriate measures to be initiated to address the matter.

The supplier/partner must, on request, be able to provide documentation proving compliance with this CoC. Fjernvarme Fyn may conduct follow-up dialogue, request documentation, and carry out visits to verify compliance. In the event of confirmed deviations, the supplier must, without undue delay, inform Fjernvarme Fyn and, if the matter cannot be corrected immediately, present a remediation plan within a reasonable time frame.

Repeated or serious breaches of this CoC may result in suspension and, in the worst case, termination of the cooperation. Examples include, but are not limited to:

- Serious disregard of legislation

- Breaches of human rights or working conditions such as child labour, forced labour, or discrimination
- Breaches of environmental and safety regulations. Failure to ensure a safe and healthy working environment
- Corruption, bribery, extortion, or other unethical financial conduct
- Failure to comply with contractual obligations, including timely payment of wages
- Deliberate withholding of information or documentation concerning compliance with the CoC
- Repeated instances of harassment, violence, or other abusive behaviour in the workplace

We may terminate the cooperation if the supplier/partner fails to comply with remediation requests or to rectify material issues.

Matters mentioned under the section Responsible business conduct and anti-corruption may lead to termination without further notice.



Embedding and communication

Management is responsible for ensuring that the CoC is embedded in the organisation and integrated into relevant management systems. The CoC must be communicated continuously and used as an active tool in day-to-day operations, both internally and externally.

Fjernvarme Fyn works to ensure that employees, suppliers, and partners know the purpose of the CoC and understand how the principles are put into practice. This is achieved through information, training, and dialogue in relevant contexts.

Embedding is supported by clearly defining responsibilities and tasks in relation to the CoC across the organisation and through procedures that specifically support compliance with the CoC.

Review and updates

The CoC is revised as needed, including in the event of significant changes in legislation, the current risk profile, the ownership policy, or the company's activities.

The review is carried out by the responsible functions (Sustainable Development) in collaboration with the organisation to ensure that the CoC reflects current requirements and Fjernvarme Fyn's practice.

Updated versions will always be available on Fjernvarme Fyn's website and intranet.



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www.fjernvarmefyn.dk



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