

**VANA**<sup>TM</sup>

DANSK  
EMBALLAGEANSVAR

**VANA A/S**  
**Code of Conduct**  
**English version**

## Introduction

As a Producer Responsibility Organisation (PRO), VANA is the companies' guarantor that they live up to the obligations of the producer responsibility for packaging - legally, financially, and practically.

Behind VANA are the four trade and business organisations: Landbrug & Fødevarer (the Danish Agriculture & Food Council), DagSam (The Grocery Industry's Cooperation Committee), Dansk Erhverv (the Danish Chamber of Commerce) and Dansk Industri (the Confederation of Danish Industry), which founded VANA in 2021 to help Danish companies meet the producer responsibility.

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## Mission and vision

VANAs vision is to be:

- The preferred PRO for the extended producer responsibility in Denmark

VANAs mission is to:

- Contribute to the circular economy by lifting our member's producer responsibility in an environmentally sound, administratively simple and cost-effective way.

## Purpose

VANA's Code of Conduct is our overall ethical guidelines, which expresses and supports our continuous aim to act in accordance with our values of propriety, responsibility and quality.

It is part of VANA's governance model and supports VANA's Competition Compliance Guidelines and Circular Economy Strategy. No one in VANA has the authority to grant waivers from the Code of Conduct.

## Scope

VANA's Code of Conduct applies to VANA's board, management, employees and members in VANA. If there are any concerns or questions about the content or compliance with this Code of Conduct, VANA's CEO should be contacted.

Specifically for business partners and suppliers: All external companies that have an agreement or contract with VANA will no later than from the time when the producer responsibility for packaging enters into force, be covered by VANA's Circular Economy Strategy including a Code of Conduct for Business Partners, which sets specific requirements for measurability, documentation and audit regarding compliance with inter alia legislation regarding the environment and health and safety. Violations of the Code of Conduct can be reported anonymously and confidentially through VANA's whistleblower service, which will be in place no later than from when the producer responsibility for packaging enters into force.

The Code of Conduct is approved by VANA's board and is revised once a year. It is available in an English and Danish version on VANA's website.

## **VANA's Code of Conduct is, among other, based on:**

- The UN's Universal Declaration of Human Rights
- The conventions from the International Labour Organization (ILO) on fundamental principles and rights at work
- The UN's Global Compact ten principles
- The UN's global goals, including specifically goals 9, 11, 12 and 14.

## **Human rights**

VANA supports and respects the protection of international proclaimed human rights. VANA ensures that the operation of VANA does not contribute to violations of human rights. This entails inter alia, that VANA does not practice discrimination in employment, including discrimination based on race, gender, ethnicity, sexual orientation, political belief, religion, disability or any other protected status.

## **Labour rights**

VANA does not tolerate discrimination or harassment in any form. Employees and management have a responsibility to treat each other with respect and create a safe environment in the workplace, just as working conditions, rights, pay and development opportunities must be in accordance with the principles of equal treatment.

VANA does not accept any form of child labour or modern slavery, including human trafficking or forced labour, just as VANA does not accept the use of convicts or illegal labour in the production of goods or services for VANA. VANA supports and respects the employees own right to participate in associations and their right to collective bargaining.

## **Environment**

All environmental laws and regulations must be complied with in the operation of VANA, especially including the regulations in the Danish Environmental Protection Act.

VANA's mission is to contribute to the circular economy by lifting our member's producer responsibility in an environmentally sound, administratively simple and cost-effective way. This means that we strive to reduce negative environmental impacts in all activities. This applies both in the operation of VANA and in connection with waste treatment.

We want to promote environmentally sound packaging and ensure recycling at a high level. This is expressed in VANA's Circular Economy Strategy and Code of Conduct for Business Partners, which contain specific requirements for measurability, documentation and audits concerning compliance with inter alia legislation regarding environment, health and safety.

In addition, VANA works to secure data to support our member's compliance with ESG reporting requirements.

## **Anti-corruption**

VANA does not tolerate any form of corruption or bribery.

In all contexts, VANA wants to appear as a neutral partner to the outside world. Therefore, VANA must not risk being placed in a special "dependency" relationship with individual business partners.

VANA never gives gifts to public servants and politicians.

Business partners, suppliers, etc. must always inform VANA's management in advance in writing if business partners, suppliers, etc. intends to offer a VANA employee gifts, services or invitations that are more than just usual, modest gifts, etc. VANA's management can in all cases order business partners, suppliers, etc. to refrain from offering specific gifts etc.

## **Competition**

VANA wants to ensure fair competition and does not accept any kind of competition-distorting activity. The board, management, employees, business partners and members must always comply with applicable competition legislation, including ensuring that information is not exchanged in a way that risks obstructing, limiting or distorting competition.

Participants in workshops, network meetings or other facilitated by VANA must act in accordance with VANA's Competition Compliance Guidelines, which can be found in a Danish and English version on VANA's website.

# **VANA A/S Code of Conduct**

## **English version**

Version 1.0

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