

CODE OF CONDUCT



Phoenix Design Aid®

The Phoenix Design Aid Code of Conduct

This Code of Conduct comprises Phoenix Design Aid's guidelines for issues relating to corporate responsibility and also determines the best practices for its employees and the organization as a whole. The Code of Conduct also lists the steps Phoenix Design Aid requires its partners to take within the field of corporate social responsibility (CSR).

The Code of Conduct originates from Phoenix Design Aid's internal Sustainable Development Goals (SDG) management system and comprises a short list of key requirements, explaining what the company expects of itself and its stakeholders. The objective is to create clarity and to encourage those with whom the company collaborates to take a greater interest in social responsibility and support the SDGs.

Phoenix Design Aid requires all its partners to sign a document, whereby they commit to adhering to the company's Code of Conduct.

The Phoenix Design Aid Code of Conduct should be used as a dialogue-promoting tool in any of the following situations:

- When communicating with stakeholders; customers, partners, authorities, etc.
- When introducing new employees to the organization.
- When material is needed for the ongoing assessment and evaluation of the effects of the company's partners' CSR and SDG activities.

Guidelines for Employees

Phoenix Design Aid is founded on respect. The company respects its clients, its employees and the world, and respect makes demands on all to think and act responsibly.

Quality

- Phoenix Design Aid has ambitious requirements for the quality delivered by its partners, and the company focuses intensely on dialogue as a tool in the process of achieving them. Phoenix Design Aid seeks to ensure that its customers have faith in the process, that they exercise an influence on all important factors and are satisfied with the final result.
- Phoenix Design Aid works with the intention of always supplying the best possible quality.
- Phoenix Design Aid is committed to its work, and it does its utmost to make the process flawless.



Dennis Lundø Nielsen
CEO



Photo: Groovy Graphic.

Photo: Steve Kasoa.





**MAKING
A
BETTER
WORLD**

Credibility and ethics

- Phoenix Design Aid meets its customers and colleagues with an open mind. The company is inquisitive and unbiased. Therefore, it ensures that it accommodates global diversity and demonstrates that it can work successfully, supplying innovative and high-quality products in an intercultural environment.
- Phoenix Design Aid keeps its promises and communicates openly. The company can be trusted, even under demanding conditions.
- Phoenix Design Aid strives to remain non-political and non-religious. The company does not introduce personal opinions into its dialogue with stakeholders, while recognizing that open engagement may involve diverse perspectives.
- Phoenix Design Aid engages neither in corruption nor in fraudulent activities.
- Phoenix Design Aid complies with applicable legislation and international standards for best business practice.
- Phoenix Design Aid is a member of the United Nations Global Compact and does its utmost to align the company's policies with the Ten Principles, supporting and enacting within its sphere of influence issues relating to labour, environment, human rights and anti-corruption. As a result, Phoenix Design Aid aims to comply with the strict societal and environmental demands of the industry in which the company operates.
- Phoenix Design Aid respects copyright and always seeks to ensure clarity on this issue in the management of its projects.

Sustainability and the SDGs



- Phoenix Design Aid’s approach to its organization’s impact on the environment and climate is conscious and responsible – not only in terms of its actions but also in its objective to offer its clients sustainable alternatives whenever possible.



- Phoenix Design Aid is a tolerant organization, providing ample space for diversity and for the individual employee’s need for personal well-being and development.
- Phoenix Design Aid respects human rights, and it requires its partners to do the same.
- Phoenix Design Aid considers and implements improvements in relation to the environment and quality on an ongoing basis.
- Phoenix Design Aid cooperates primarily with companies that use the best sustainable technologies available.
- Phoenix Design Aid seeks to promote CSR, sustainability and the SDGs as well as to support its partners’ efforts and communication on these issues.
- Phoenix Design Aid strives to prevent pollution and encourages its partners to do the same.



Phoenix Design Aid's commitment to the SDGs

Phoenix Design Aid is certified in 10 targets divided among SDG 4: Quality Education, SDG 12: Responsible Consumption and Production, SDG 13: Climate Action and SDG 17: Partnership for the Goals.



- Phoenix Design Aid's commitment to SDG 4 is of great importance as education has a special place in the company's heart. Phoenix Design Aid values and focuses on knowledge-sharing within topics such as the SDGs and sustainability. In addition to this, it places great emphasis on the ongoing support of NGOs that work with education, including the PDAid Foundation, the Sauti Kuu Foundation and the Kilimanjaro Initiative.



- Phoenix Design Aid's commitment to SDG 12 is embedded in the company's history and its commitment to taking care of the environment. Phoenix Design Aid supports and strives for sustainable consumption and production. Therefore, it supports and promotes sustainable paper choices as a way to reduce the environmental footprint of hard copy products.



- Phoenix Design Aid's commitment to SDG 13 is evident in its commitment to prevent pollution and reduce its environmental impact as well as energy and carbon footprint. The company minimizes its CO₂ emissions and buys emission credits to neutralize the company's CO₂ emissions and is working on better solutions in the future, for example, tree planting.



- Phoenix Design Aid's approach to business is based on its commitment to SDG 17 as it sees itself as a "partner company", focusing on the exchange of ideas, experiences and knowledge. The company places great emphasis on promotion and advocacy for the SDGs, including efforts to influence partners on how to run a business in a sustainable manner.

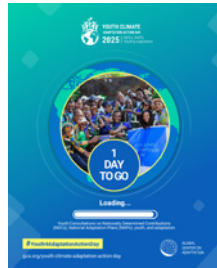
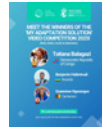




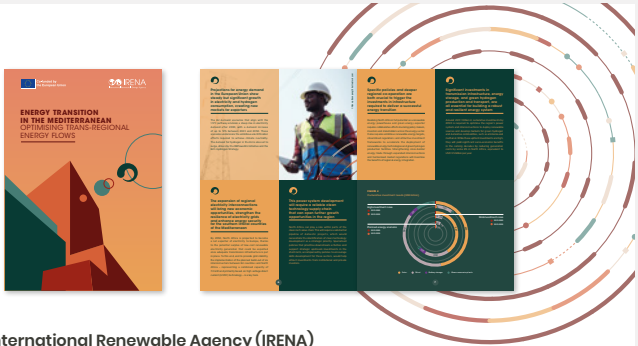
Sauti Kuu
Documentary film



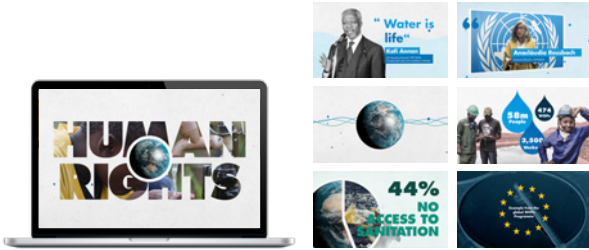
UN Volunteers (UNV)
Annual report 2024



Global Center on Adaption (GCA)
Social media support for the Youth Climate Adaptation Action Day and video competition



The international Renewable Agency (IRENA)
Brochure – Energy Transition in the Mediterranean



Global Water Operator's Partnership Alliance (GWOPA)
15th Anniversary Video



United Nations Development Programme (UNDP)
SCALE Initiative interactive learning platform

Sustainability in measures

To promote accountability and transparency, Phoenix Design Aid strives to translate its CSR and sustainability commitments into measurable indicators. These indicators form part of the company's Environmental, Social and Governance (ESG) reporting framework, while also serving broader internal management and decision-making.

Reducing environmental impact, energy use and carbon footprint are core elements for Phoenix Design Aid under ISO 14001 (Environmental Management). To support these efforts, the company documents quantitative data each year related to environmental performance, including CO₂ emissions, energy use, heating, waste, business travel and water use, for locations where data collection is possible. As part of its efforts to support more sustainable consumption and production, Phoenix Design Aid has set a target to reduce paper use at its headquarters by at least 5 per cent per year, supported by ongoing monitoring of printing levels.

Social sustainability is monitored through figures on employee representation, sick leave days and women's representation across the organization, including women in management. Additional social indicators may include health and safety initiatives, training activities and community engagement. Health and safety-related measures are core elements of Phoenix Design Aid's approach under ISO 45001 (Occupational Health and Safety Management).

Governance performance is documented through indicators such as board diversity and attendance rates at board meetings. Compliance with the Code of Conduct, maintenance of thorough risk and impact assessments as well as the company's ISO 9001 (Quality Management) certification further support management in this area.

Many of these measures are reported annually in Phoenix Design Aid's sustainability report, while others are used internally to support ongoing evaluation and continuous improvement across operations and partnerships.

Photo: Julius Mwelu.



Human rights

Phoenix Design Aid has a zero-tolerance policy for racism, discrimination, harassment or any other form of bullying. Phoenix Design Aid always complies with all laws regarding human rights, as respect for human rights is the cornerstone of the company's values and policies. Phoenix Design Aid believes in and respects its employees and partners. Thus, it always treats them and each other with respect and dignity. Phoenix Design Aid embraces diversity and has offices in multiple global locations and employees from all over the world.

As a part of its support and respect for the protection of internationally proclaimed human rights, Phoenix Design Aid has a non-tolerant focus on child labour and other forced and compulsory-like conditions, as described in the United Nations Global Compact principles. Phoenix Design Aid makes sure to monitor this through supply chain management and assessments.

Phoenix Design Aid refuses to cooperate with employees, clients, partners who do not comply with the company's Code of Conduct. Therefore, Phoenix Design Aid strongly encourages partners to support the United Nations Global Compact and live up to the procedures and guidelines set by them.

Gender equality and disability considerations

Phoenix Design Aid has a zero-tolerance policy for discrimination in employment and occupation in any form. The company encourages applicants from all backgrounds to work with Phoenix Design Aid. All applicants who qualify will be considered without any regard to race, color, religion, gender, sexual orientation, national origin, genetics, disability or age as Phoenix Design Aid is committed to creating a diverse and inclusive working environment.

Phoenix Design Aid is committed to gender equality by supporting and striving to achieve gender equity through fair and equal treatment of both women and men. This includes fairness and justice in the distribution of benefits, power, resources and responsibilities as well as equal conditions to help realize full rights and the potential to be healthy. Furthermore, Phoenix Design Aid operates with a flexible working environment – for example, by giving parents the opportunity to work from home when necessary.

The company strives to have an equal and representative management team as well as equality at the workplace. Phoenix Design Aid has signed the Gender Diversity Pledge, a joint commitment by the members of the Confederation of Danish Industry (Dansk Industri), to reach a target of a 40/60 gender distribution in leadership roles by 2030 via 16 principles aimed at promoting gender diversity.

To further strengthen the company's commitment to gender equality, Phoenix Design Aid joined the Women's Empowerment Principles (WEPs) in July 2022.

Phoenix Design Aid encourages everyone who has ever felt bullied or harassed by Phoenix Design Aid to immediately report the incident to Phoenix Design Aid's CEO or Deputy CEO. Please feel free to contact the CEO or Deputy CEO if you have any questions regarding the company's policy for human rights.

Combating terrorism

Phoenix Design Aid has a zero-tolerance policy for terrorism and does not engage in any terror-related activities. Phoenix Design Aid does not condone or accept employees, consultants or partners who engage in terrorism in any form or any other violent activity. Furthermore, Phoenix Design Aid prohibits any terror-related content (for example, content that promotes terrorists), terrorism or any other violent activity.

Phoenix Design Aid is committed to ensuring that employees, consultants and partners who should choose to engage in any terror-related activity are removed from the cooperation immediately and reported to the relevant authorities.

Photo: Unsplash.



Ethical business practice

As an international company with global offices and partnerships, Phoenix Design Aid has a strong focus on ensuring its values on ethical business practice, including anti-corruption, anti-money laundering and credible and transparent business operations. Phoenix Design Aid does not tolerate corruption or corruption-like conditions, and it is committed to running a business in accordance with the highest ethical standards by complying with all relevant laws and regulations.

Phoenix Design Aid is a member of the national association Transparency International Denmark whose overall purpose is to combat corruption and bribery worldwide. Through its membership, Phoenix Design Aid highlights its commitment to fighting corruption and enhances its discouragement of corruption.

Photo: Groovy Graphic.



Gifting policy

Phoenix Design Aid has a gifting policy that outlines guidelines around giving and receiving gifts in the company.

Internal gifts from the company to employees are acceptable within the guidelines outlined in the gifting policy, such as milestone birthdays, special circumstances, including offboarding, marriage, birth of child, surgery and deaths of close relations. Gifts for employees should be approved by either the CEO, Deputy CEO or a Director.

Externally, Phoenix Design Aid does not send nor accept personal gifts from a person, people or an entity that Phoenix Design Aid is doing any business with or has any contractual relationships with, including partners and clients. However, Phoenix Design Aid can accept corporate gifts for the office which can be shared internally among employees. It is important to note that such gifts should not influence the relationship between the parties.

Phoenix Design Aid does share and bring SDG merchandise at, for example, meetings and events with partners and clients. The SDG merchandise is considered a professional matter due to the company's promotion of the SDGs, sustainability and SDG Action Shop.

Examples and guidelines are outlined in the company's "Gifting policy", which can be shared by request. Please feel free to contact Phoenix Design Aid's CEO or Deputy CEO if you have any questions regarding the company's policy for gifting.

Digital and data responsibility

Phoenix Design Aid places strong emphasis on prioritizing data security and protection. The company's approach is supported by key documents, including an IT strategy (outlines infrastructure and security measures), an IT policy (sets the usage rules and responsibilities), an IT security policy (establishes safe and effective operations) and an IT contingency plan (details procedures in the event of an incident).

This is all supported by a backup process and server overview. Data is stored on company servers and Microsoft Office 365 with daily and weekly backups, and project files are retained for at least three years. Annual IT risk assessments, aligned with Phoenix Design Aid's ISO 9001 certification, further strengthen the company's proactive approach to managing robust IT governance and data protection risks.

Phoenix Design Aid adheres to the General Data Protection Regulations (GDPR), a data privacy and security law established by the European Union. To ensure compliance, Phoenix Design Aid has procedures for the processing, usage and storage of curriculum vitae (CVs), images and videos. The procedures also outline rules around consent and information to the parties involved.

To secure confidentiality around various data objects, Phoenix Design Aid also operates with Non-Disclosure Agreements (NDAs).

Phoenix Design Aid Spain is certified in ISO/IEC 27001, the internationally recognized standard for information security management systems (ISMS). This provides the company with a framework to manage its information security and data protection. With this certification, Phoenix Design Aid Spain has adopted a systematic approach to establishing, implementing, maintaining, monitoring and improving its ISMS.



Photo: Unsplash.

In the event of a personal data breach or leak, Phoenix Design Aid follows the guidance of the Danish Data Protection Agency, in compliance with Danish data protection legislation based on GDPR.

For any questions or concerns related to GDPR, including inquiries regarding the processing or storage of personal data, Phoenix Design Aid can be contacted directly at GDPR@phoenixdesignaid.com. All parties are encouraged to use this email address to seek guidance or clarification on data protection matters.

Photo: Dennis Lundo Nielsen.

AIMING FOR THE TOP



Guidelines for partners

Phoenix Design Aid is founded on respect. The company respects its clients, its employees and the world. Phoenix Design Aid demands much of itself, and it expects that its partners have the same approach to the world around them.

Quality

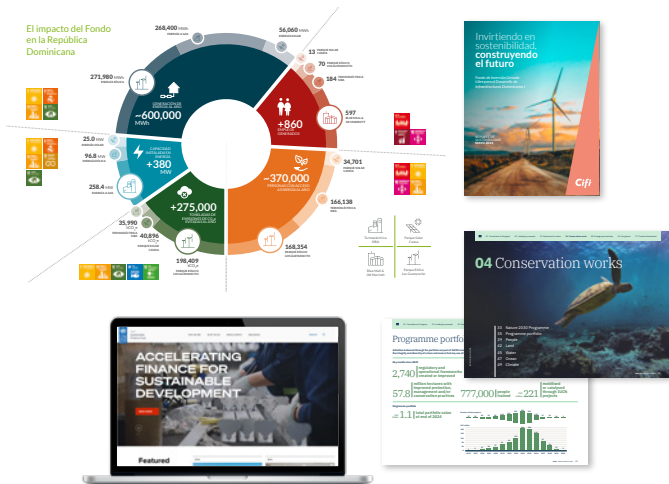
- Phoenix Design Aid expects its partners to deliver the agreed quality at the agreed time.
- Phoenix Design Aid expects its partners to have complete clarity over property rights, copyright and similar issues in relation to partners' deliveries to its projects.
- Phoenix Design Aid seeks to help its partners determine and pursue the means necessary to achieve satisfactory levels of quality management.

Credibility and ethics

- Phoenix Design Aid expects its partners to comply with applicable legislation and international standards for best business practices.
- Phoenix Design Aid expects an open and honest dialogue with its partners on CSR-related issues – also when pending issues need to be resolved.
- Phoenix Design Aid accepts neither corruption nor fraudulent activities.
- Phoenix Design Aid does not work with organizations or companies which cannot comply with applicable legislation and human rights conventions.

Sustainability in the supply chain

- Phoenix Design Aid prefers to work in long-term, mutually beneficial partnerships.
- Phoenix Design Aid prefers partners who have a proven CSR track record and show commitment to supporting the SDGs. Their track record may include:
 - CSR, SDG, environmental, labour or climate certification
 - Adherence to the United Nations Global Compact initiative
 - Specific improvements within the field of CSR
 - Environmental labeling of products or services, for example, FSC, CoCTM, Nordic or European eco-labels
- Phoenix Design Aid assesses its partners' performance within the field of CSR on an ongoing basis through an open and appreciative dialogue.
- Phoenix Design Aid is always willing to assist its regular partners, providing inspiration and know-how about the SDGs with a view to encouraging continued sustainable development.
- Phoenix Design Aid encourages all its stakeholders to work with the SDGs and take part in SDG-related networks.



Process for remedial action

Despite solid implementation of due diligence, complaint and grievance issues may arise. Phoenix Design Aid meets all requirements of the United Nations Guiding Principles and the United Nations Global Compact programme, including processes for handling with complaints as well as implementing remedial measures.

Remedial action is guided by principles of legitimacy, availability, foreseeability, fairness and transparency. All complaints are addressed through dialogue and mediation, aiming for a mutual understanding of the issue at hand. If dialogue does not lead to a resolution, the Danish Mediation and Complaints-Handling Institution will be engaged as a separate and independent body to handle the complaints process.

Phoenix Design Aid is committed to addressing client concerns with utmost seriousness, especially those relating to CSR activities, including respect for human rights. The process for remedial action is carefully detailed in the company handbook, which is also accessible via the company's website.

Are you in doubt?

Phoenix Design Aid realizes that it is impossible to cover all SDG- and CSR-related aspects and every ethical dilemma in a Code of Conduct.

Situations will inevitably arise in which you, as an employee or partner, are unsure of your choice or course of action and in which you must rely on your own powers of judgment and common sense.

Please feel free to contact Phoenix Design Aid's CEO or Deputy CEO in situations where doubt occurs.

Photo: Groovy Graphic.



In situations where doubt occurs, Phoenix Design Aid encourages you to consult this brief, general guide for inspiration and to contact the company's CEO or Deputy CEO.

- 1.** Do you have sufficient information to reach a decision?
- 2.** Does it live up to best practices at Phoenix Design Aid and in your organization?
- 3.** Is it legal?
- 4.** Who will your decision affect at Phoenix Design Aid? Will your decision affect stakeholders and your surroundings?
- 5.** Could your decision damage Phoenix Design Aid's, your own or stakeholders' reputation?
- 6.** Is there an alternative course of action that would circumvent the dilemma?
- 7.** Are you able to reach a decision of which you can be proud?
- 8.** Does it feel right?
- 9.** Consider how you can avoid having to face the same dilemma in the future?
- 10.** To whom will you explain this situation?

Photo: Groovy Graphic.



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