

LEIFWOOD APS

CODE OF CONDUCT



VERSION 1.0

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1. INTRODUCTION AND PURPOSE

“Half of all the species on the planet live in forests. Forests regulate water supplies and the world’s climate. They are a source of medicines and help to prevent floods and droughts. Unfortunately, illegal logging has been identified as a key driver of deforestation and degradation, leading to biodiversity loss and subsequent climate implications”
(Source: *Bio Macht project 2019*)

At Leifwood ApS, integrity and responsibility are the cornerstones of all our activities. We are committed to upholding the highest standards of ethical conduct and accountability by adhering to national and international frameworks, including the UN Global Compact. This Code of Conduct outlines the minimum requirements expected of all employees, suppliers, contractors, and business partners to ensure sustainable, fair, and transparent business.

2. SCOPE AND APPLICABILITY

This Code applies to the entire organization, including management, full-time and part-time employees, temporary and agency staff, suppliers, subcontractors, agents, consultants, and key customers. All partners must operate in full compliance with this Code, and suppliers are required to extend these standards to their own subcontractors and supply chains.

3. OUR VALUES AND BUSINESS PRINCIPLES

We believe in long-term relationships built on trust, respect, equity and transparency. Our business principles are:

Respect

We treat everyone with dignity and value diversity, both internally and externally

Integrity

We act with honesty, even when no one is watching

Responsibility

We take full responsibility for our actions, products, and the impact we have on society and the environment

Openness

We welcome feed-back, foster dialogue, and listen to our stakeholders

4. HUMAN RIGHTS AND EMPLOYEE WELLBEING

We are committed to protecting fundamental human rights as outlined in the Universal Declaration of Human Rights and ILO's core conventions:

Non-Discrimination

Employment-related decisions are based solely on qualifications, competence, and performance, regardless of race, gender, religion, or other protected characteristics.

Working Environment

We maintain a safe, healthy, and supportive workplace, investing in occupational health and safety programs, regular risk assessments, and prevention of accidents.

Harassment-Free Workplace

We do not tolerate any form of harassment or abuse, and a confidential grievance procedure is in place.

Freedom of Association

Employees are free to join, form, or not join collective bargaining units or labour unions.

5. FAIR EMPLOYMENT PRACTISES

Contracts and Terms

Everyone is provided with a written contract, outlining employment conditions and expectations, in a language the employee understands.

Wages and Benefits

All staff are paid at least the legal minimum wage and receive all mandatory benefits, including paid holidays and leave.

Working Hours

We do not require staff to work more than permitted by law, and all overtime is compensated transparently.

Nor Forced or Child Labour

We do not allow or tolerate any form of forced, bonded, or child labour. We confirm staff age and legal right to work.

Employee Development

We support career development through training, appraisals, and progression opportunities.

6. COMMUNITY RELATIONS

As a responsible business, we engage openly with local communities, seek to understand and address their concerns, support local economic and social development, and avoid adverse impact on local health, land, or heritage. Stakeholder engagement and consultation are part of project planning.

7. ENVIRONMENTAL RESPONSIBILITY

Sustainability Policy

Our sustainability strategy lives up to sustainable forest management.

Legal Compliance

We comply with and often go beyond all applicable environmental regulations.

Resource Efficiency

We aim to minimize waste and make sustainable use of water, energy, and raw materials.

Waste Management

We maintain separation and recycling systems and avoid hazardous materials.

Biodiversity Protection

We avoid sourcing timber from protected or endangered forests and proactively support reforestation

8. SUPPLIER MANAGEMENT

We recognize that our supply chain is integral to our impact.

Onboarding Process

All new suppliers are subject to risk-based assessments for quality management, environmental management and social compliance.

Auditing and Review

We schedule regular on-site and desk-based audits, especially for high-risk suppliers, and review audit findings to assess compliance.

Documentation

Contracts and policies are kept up-to-date and securely archived.

Issue Handling

Non-compliance leads to corrective action plans, guidance, and, in persistent cases, termination of the relationship.

9. SCREENING AND DUE DILIGENCE OF CUSTOMERS AND SUPPLIERS

Prior to commencing a cooperation with a new customer or a new supplier, a stringent screening process is conducted. The purpose of this process is to assure, that we work with customers and suppliers within the timber industry. Further to ensure that the partner in question can honour financial and supply commitments as agreed.

Customer & Supplier due diligence (CSDD) is the process by which Leifwood ApS identify and verify individuals before they become customers and / or suppliers, and how they we assess risk throughout a customer's and suppliers' lifecycle. The CSDD process helps us understand and manage and prevent financial crimes like money laundering and fraud.

The CSDD is a process used to verify a person's identity - usually through documentation or data checks - and to assess any risk associated with them. This review and risk assessment process takes place before a new customer and / or supplier is onboarded, and it might happen at intervals throughout theirs' lifecycle to ensure nothing has changed in their risk profile and no illicit activity has been identified.

Identify and verify the identity of customers and / or suppliers

- ID and visa verification of management & owners in the company
- Copy of passport, identification card incl. full address in homeland as well where currently based

Identify and verify the identity of the beneficial owners of the company in question

- Ultimate business ownership (UBO) and shareholder identification by submission of registration documents

Identify and verify associated bank account is related to the company in question

- Identify and verify that the provided bank account is the bank account related to the company. Bank statement needs to be provided.

In 2026, Leifwood ApS will explore the possibility of including control of our customers' dual use of products and technology
(<https://eksportkontrol.erhvervsstyrelsen.dk/faa-hjaelp-til-tjek-af-din-kunde-0>)

10. REGULATORY COMPLIANCE: EUTR/EUDR

Traceability

Full documentation is required for all timber traded (to Europe)

Due Diligence

We implement robust systems to ensure legal harvesting and prevent trade in illegally sourced or deforested timber

Record-Keeping

We maintain documentation of wood origin, legality, and supply chain for regulatory inspection.

Training

We receive regular updates on new legal requirements and undertakes internal audits.

Reporting

We cooperate fully with regulatory authorities and are ready for audits.

11. ANTI-CORRUPTION & FAIR BUSINESS CONDUCT

Zero Tolerance

Bribery, corruption, extortion, fraud, and facilitation payments are not allowed under any circumstances.

Controls

We have strong internal communication to prevent and detect misconduct.

Red Flags

Clear procedures for staff to report suspicious behavior, conflicts of interest, or gifts and hospitality that could influence business decisions.

Contractual Requirements

Suppliers must confirm anti-bribery and anti-corruption practises

12. REPORTING, REMEDIATION, AND SANCTIONS

Confidential Channels

We cooperate fully with regulatory authorities and are ready for audits.

Responsiveness

All complaints are investigated promptly, with full protection against retaliation.

Remediation

If breaches are confirmed, corrective actions and regular follow-ups are mandatory.

Sanctions

Deliberate or repeated violations result in termination of employment or cooperation and may be reported to authorities

13. TRAINING AND AWARENESS

All employees and partners must complete introductory and refresher training on this Code, EUDR/EUTR, and anti-corruption every year.

Managers are responsible for promoting awareness and compliance in their teams.

14. REVIEW AND REVISION

Management reviews and updates this Code of Conduct annually or when significant changes occur (e.g. regulatory updates, new market risks). Employees and Business Partners may suggest improvement at any time.