

# Nordlaks Supplier Code of Conduct

Updated per 26<sup>th</sup> June 2023

## 1. INTRODUCTION

Nordlaks Holding AS and its subsidiaries (**Nordlaks**) promotes and expects the application of high legal, ethical, environmental and employee-related standards within our own business and also among our suppliers and business partners.

Nordlaks encourages sustainable business practices with respect for people, community and environment, and where negative impact on fundamental human rights, decent working conditions and the environment is avoided and prevented. We have developed guidelines for sustainable business practices that all our employees and other workers (jointly referred to as **Employees**) must follow.

We have also drawn up these guidelines for sustainable business practices for our supply chain and business partners (**Supplier Code of Conduct**). We expect all suppliers and business partners (hereafter jointly referred to as **Suppliers**) to work systematically to comply with, and actively promote, the Supplier Code of Conduct in their business.

Our Supplier Code of Conduct outlines the minimum standards of business conduct we expect from all our suppliers and business partners to ensure responsible practices throughout the supply chain.

Suppliers shall ensure that their own suppliers and business partners comply with the requirements under this Code of Conduct, or an equivalent thereof.

Nordlaks engages actively in due diligence, and continuously maps the risk of negative impact on people, society and the environment, in its own operations and in the supply chain. If any of our activities cause or contribute to a negative impact on people, society or the environment, we will follow up and seek to rectify the negative effects.

Nordlaks expects that the Suppliers actively implement appropriate measures to assess, prevent and mitigate potential adverse impacts on fundamental human rights and decent working conditions in a manner consistent with international human rights guidelines.

## **2. GUIDELINES FOR SUSTAINABLE BUSINESS PRACTICES – CODE OF CONDUCT**

### **2.1. GENERAL**

Suppliers shall at all times comply with all laws and regulations applicable to them, including, but not limited to, the matters set out in this Code of Conduct.

Where differences exist between applicable laws, regulations and the Supplier Code of Conduct, the Suppliers shall follow the strictest requirements.

### **2.2. HUMAN RIGHTS**

Suppliers shall support and respect the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses.

### **2.3. LABOUR RIGHTS**

Suppliers shall comply with the rights of workers described in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966 and the International Labour Organisation (ILO) Core Conventions, and the United Nations Global Compact Principles, and in particular the following:

- Suppliers shall not employ or use child labour. Suppliers shall ensure that no person under the age of 18 performs any hazardous work.
- Suppliers shall not employ or use any form of involuntary, bonded, forced or compulsory labour, and shall strictly prohibit any form of slavery or human trafficking.
- Suppliers shall provide equal opportunities for its Employees and may not discriminate based on race, ethnicity, disability, age, gender, sexual orientation or religion.
- Suppliers shall respect and uphold their employees' right to freedom of association, involving trade unions or similar external representative organizations. Their employees should have the right to collective bargaining in accordance with applicable laws.

- Suppliers shall at a minimum comply with the requirement of applicable laws, regulations and industry standards concerning working contracts, work hours and minimum wages.

Suppliers shall have a written policy that clearly states the requirements of this paragraph and ensure implementation within the organisation.

## **2.4. HEALTH AND SAFETY**

Suppliers shall provide safe and healthy working conditions, and if applicable, safe and healthy living quarters, for their Employees in compliance with international standards and national laws.

Suppliers shall have a written health and safety policy that shall be communicated, and made freely available to all Employees. Suppliers shall demonstrate compliance with the policy and continuously seek to minimise accidents and risks.

## **2.5. ANTI-CORRUPTION**

Nordlaks expects the highest standard of integrity in our business dealings. All forms of corruption, extortion, fraud or bribery are strictly prohibited. Suppliers shall comply with all applicable laws and regulations and have in place and enforce policies and procedures adequate to ensure compliance.

## **2.6. ENVIRONMENT**

The environmental impact of the Suppliers` operations shall be measured, monitored and reviewed regularly. The Suppliers shall proactively minimise potential negative environmental impact of its operations and demonstrate continuous improvements.

Suppliers shall demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide. Suppliers shall have an environmental policy in place to mitigate these risks. The policy shall include clear targets and as a minimum cover use of resources and the handling of waste.

## **2.7. CONFLICTS OF INTEREST**

Nordlaks expects their Employees and Suppliers to immediately inform about and handle situations where there is a real, potential or perceived conflict of interest, and avoid situations where such conflicts of interests may arise.

## **2.8. MONEY LAUNDERING**

Suppliers shall refrain from all forms of money laundering and shall take appropriate steps to prevent financial transactions from being used by others to launder money or finance terrorism.

## **2.9. COMPETITION**

Suppliers shall support a free and fair competition, and shall not enter into, seek to enter into or otherwise participate in agreements, events or activities that would be a breach of applicable competition laws and regulations.

## **2.10. TRADE SANCTIONS**

Suppliers shall comply with relevant trade sanctions.

## **2.11. DATA PROTECTION**

Suppliers shall comply with applicable data protection legislation.

## **3. MANAGEMENT SYSTEMS**

Suppliers shall implement management systems to ensure compliance with all applicable laws, and promote continuous improvement with respect to the requirements outlined in this Supplier Code of Conduct.

Suppliers shall ensure that reporting mechanisms and processes/routines are established in order for employees, workers and any affected stakeholders to be able to report/raise concerns, or request information relating to the Suppliers' business operations.

## **4. IMPLEMENTATION AND AUDIT**

Suppliers are expected to maintain appropriate records to demonstrate compliance with the Supplier Code of Conduct. Nordlaks may request documentation or require an onsite audit to evaluate a supplier's adherence to all or any requirements in this Code, and this extends to the level of sub-suppliers associated with the delivery to Nordlaks. We require Suppliers to fully collaborate with such audits. Audits shall, as far as possible, be carried out within normal working hours and following written prior notice.

When carrying out such audits, Nordlaks may use its own personnel or external consultants. The Supplier shall provide access to and inform Nordlaks or its consultants of any premises where the Supplier performs work and submit documents relevant to the Supplier Code of Conduct. The information and documentation submitted to Nordlaks or Nordlaks' external consultants will be used to assess compliance with the Supplier Code of Conduct and to fulfil Nordlaks' statutory duties, and shall not be used for other purposes. The Supplier shall also assist Nordlaks to carry out corresponding audits on the Suppliers' subcontractors and/or business partners if required by Nordlaks.

## **5. REPORTING OBLIGATION**

If the Supplier becomes aware of non-compliance with the Supplier Code of Conduct in its own operations or in the sub-supply chain, or otherwise significant changes in the company's risk assessments related to fundamental human rights, decent working conditions, the environment and anti-corruption, the Supplier shall report this to Nordlaks immediately.

In order to ensure that Nordlaks is able to carry out due diligence of the Supplier in accordance with policies and applicable legislation, the Supplier must be able to document how they, and possibly their subcontractors, supply chain and/or business partners, work to comply with the Code of Conduct. This may be done through follow-up meetings, or that the Supplier must answer a list of questions from Nordlaks in writing within a specified deadline. Should Nordlaks request an assessment of any subcontractors' and business partners' compliance with the guidelines beyond that received from the Supplier, the Supplier is required to provide the name and contact details of subcontractors and business partners, unless this is not permitted by law or agreement.

Furthermore, the Supplier shall respond to any request from Nordlaks relating to the goods or services supplied by the Supplier to Nordlaks, including questions relating to potential or actual negative impact on fundamental human rights, decent working conditions, the environment and anti-corruption, and how this is handled. Written, intelligible and thorough responses shall be given no later than two weeks after the request has been received from Nordlaks. If local law provides a legal basis for refusing the information request from Nordlaks, the Supplier shall document such redaction.

## **6. CONSEQUENCES OF NON-COMPLIANCE**

In the event of serious or repeated violations of this Supplier Code of Conduct, Nordlaks has the right to terminate existing contracts with the Supplier or terminate business

relationships or other forms of cooperation without it being considered a breach of contract. However, Nordlaks may choose to continue its cooperation with the Supplier with the aim of making improvements and to seek to restore the situation for and enable remediation to affected parties.

**7. ACKNOWLEDGEMENT**

I have read and understood the Nordlaks Supplier Code of Conduct. On behalf of the Supplier I represent, we agree to comply with its content.

Place and date: \_\_\_\_\_

Name of supplier: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

**8. REFERENCES**

- Universal Declaration on Human Rights  
<https://www.un.org/en/universal-declaration-human-rights/index.html>
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work  
<http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org>
- Principles of the United Nations Global Compact  
<http://www.unglobalcompact.org>