

## **NORDTREAT SUPPLIER CODE OF CONDUCT**

Nordtreat is committed to being a leader in Corporate Responsibility & Sustainability (CR&S).

As part of this commitment we seek to create shared value by ensuring that companies within our supply chain:

- Comply with all legal requirements and standards
- Reduce carbon emissions
- Operate accordingly to sound environmental principles
- Manage their people ethically
- Drive positive supplier relationships and
- Consider the impacts of their activities on the social and environmental sustainability of the communities in which we operate

Our responsibility is to ensure ethical, environmental, and social standards are maintained and continuously improved throughout our supply chain. We acknowledge that we can have a positive influence on our suppliers and contractors and their employees, products and services. This Supplier Code of Conduct outlines our commitment to, and expectations of, all organizations within our supply chain.

### **Application**

This Code of Conduct applies to all suppliers, contractors, and sub-contractors across all areas of Nordtreat's operations.

It aims to encourage, support, and where appropriate, mandate requirements that will assist Nordtreat and our suppliers to work towards a low carbon future.

Nordtreat's suppliers and other business partners (herein after the 'Supplier') must comply with all applicable laws, applicable international standards and the following Supplier Code of Conduct. The Supplier is responsible to ensure that their suppliers and subcontractors follow and comply with this Supplier Code of Conduct, and fully understand its content and the obligations it sets. The Supplier must offer assistance and training when required to fulfill the set obligations.

### **Compliance**

The Supplier complies with all applicable national laws and regulations. Of particular significance are laws concerning occupational health and safety, equality, non-discrimination, privacy, bribery and corruption, competition, environmental protection, and product and food safety.

When national laws are not compatible with international human rights, the Supplier should attempt to find ways in which to also comply with the applicable international regulation.

The Supplier is required, when requested by Nordtreat, to be subjected to a quality assurance system, which fulfills at minimum the standards of ISO 9001:2015 or a more recent version thereof.

It is required that the Supplier has organized A Whistleblowing channel.

### **Bribery and anti-corruption**

Any form of bribery or corruption is not tolerated. This includes any promise of payment or payment of bribes and illegal payments to the authorities or other parties, or any advice or incitement to anyone to offer or accept them.

Any form of money laundering, financing of terrorism or other illegal activities, or unlawful restrictive trade practices are strictly prohibited.

### **Fair Competition**

The Supplier is required to comply with all applicable competition laws. No illegal or restricting business methods are accepted.

The Supplier considers conflicts of interests and requires its employees to notify without delay of any condition which could be or could be perceived as a conflict of interest. Conflict of interests can also include, but not limited to, personal benefits and benefits to the person's family.

### **Gifts and hospitality**

The Supplier must comply with all laws and standards issued on giving and accepting gifts and applicable standards are assessed in accordance with the legal requirements of each jurisdiction. Any personal gifts or hospitality must be considered of little value and common.

### **Human rights**

The Supplier must respect and comply with all internationally recognized human rights, and promote human rights in practice. The Supplier should consider international human rights as noted in the Universal Declaration of Human Rights and the Core Conventions of International Labor.

### **Discrimination**

The Supplier must treat all employees equally. Discrimination of any form is not tolerated, which includes discrimination based on gender, religion, age, ethical background, disabilities, physical characteristics, health, personal background, gender identity, marital status, sexual orientation, political beliefs, trade union memberships, or any other grounds.

Discrimination, threats, oppression, sexual harassment or harassment in any form is not tolerated by the Supplier.

### **Labor rights**

The Supplier is obliged to comply with national laws and to respect all internationally declared labor rights. When national laws are not compatible with international standards, the Supplier should attempt to find ways in which to also comply with international standards.

The Supplier is required to treat its employees fairly, equally and with respect. The Supplier must respect all employee's personal dignity and their health, safety, privacy, freedom of religion and conscience.

### **Working hours and wages**

Working hours must comply with national legislation and applicable collective agreements.

Wages, benefits and overtime compensation must comply with national legislation and applicable collective agreements. Any deduction from wages as a disciplinary measure is prohibited.

### **Health and Work Safety**

The Supplier must comply with all national laws and all applicable international standards. When national laws are not compatible with international standards, the Supplier must attempt to comply with international standards.

The supplier should actively work to prevent accidents and injuries. All work related injuries and illnesses must be prevented to the best of the Suppliers capability. The Supplier must also actively find solutions to ensure the enjoyment of health of its employees.

The supplier must comply with Nordtreat's safety requirements when working at or visiting at Nordtreat premises and carry out necessary safety training.

The Supplier shall respect the right of all employees to freely and voluntarily establish and join organizations of their own choice in accordance with national laws and collective agreements.

### **Forced labour**

No form of bonded labor, forced labor or labor with fear of punishment is permitted. Employees must work at their own will for compensation and employees should be free to leave and change their employment when they wish. For example, taking or withholding employees' passports is prohibited.

The supplier does not tolerate or accept any form of human trafficking and is required to ensure that employees working with transport assure human trafficking does not occur during transportation of products.

## **Child Labour**

Child labour is not permitted. Every child is to be protected from economic exploitation and from carrying out work that can be considered to have a negative effect on the child's education or be harmful to the child's health or development.

Child labor is considered to be work carried out by a child who is under 15 years of age, or under 14 years of age in those countries specified in Article 2.4 of ILO Convention 138.

Any hazardous work shall not be conducted by an individual between the ages 15-18 years.

## **Environment**

The supplier shall comply with all national laws and standards. For example the supplier is prohibited polluting the ground or waters. Suppliers are encouraged to act in an environmentally friendly way. For example the Supplier should ensure appropriate handling of waste, record their water discharges and emission to air, and attempt to minimize waste and effluent.

Ensure good environmental performance by:

- maintaining an Environmental Management System (EMS)
- managing and reducing the environmental impacts of their activities
- minimizing carbon emissions
- reducing transport footprints and
- minimizing the use of materials and resources
- sustainable and responsible sourcing

## **Communication**

The supplier is required to communicate openly and honestly with Nordtreat. The Supplier is required to present truthful information and all required information.

## **Confidentiality**

The supplier must comply with the strictest rules of confidentiality regarding personnel, customers, business partners and trade secrets.

## **Compliance and enforcement**

It is the Supplier responsibility to ensure that this Supplier code of conduct is implemented and complied with in practice.

It is the duty of the Supplier to immediately report directly to Nordtreat any suspected or detected violations of the supplier code of conduct or any applicable laws.

Nordtreat reserves the right to conduct audits and other inspections to all of the suppliers locations and facilities by Nordtreat employees or by third party to ensure that all parts and aspects of this supplier Code of Conduct is being implemented and complied with.

In case the Supplier fails to comply with the terms of this Supplier Code of Conduct Nordtreat has the exclusive right to require improvements by the Supplier in related matters. If improvements are not made within a Nordtreat established time period Nordtreat has the exclusive authority to terminate its contract and business with the Suppliers.

***Title, date place***

***Supplier representative signature***