

## Nobia's Code of Conduct for Suppliers

### Introduction

The provisions set forth in Nobia's Code of Conduct for Suppliers (the "Code of Conduct") states the expectations Nobia has on all suppliers with whom Nobia does business. Nobia expects that these principles apply to suppliers, any group the supplier may be part of, including affiliate entities, as well as all others with whom they do business with including employees, subcontractors and other third parties.

Nobia expects that suppliers ensure that Code of Conduct is communicated to employees and subcontractors and that it is done in the local language and in a manner, that is understood by all.

Nobia recognise that many of our suppliers are committed to uphold and promote these principles set forth in the Code of Conduct in their operations and supply chains. Nobia is aware of that some aspects of the Code of Conduct are more relevant to our manufacturing business partners than to our service business partners. When presenting the Code of Conduct in a general format, our aim is to provide clarity and sufficient detail for all business partners on our expectations.

### Legal compliance is guaranteed

The supplier shall be fully compliant with all relevant international and national laws and regulations. In particular, the supplier

- guarantees that there are routines in place to ensure compliance with all applicable laws and regulations in the countries where they carry out their business activities;
- the supplier shall always comply with the most demanding requirements whether they come from applicable laws or the Code of Conduct.

### No forced labour

The supplier shall never use forced labour conditions. In particular, this means that

- the supplier shall not use any form of forced, bonded or compulsory labour, slavery or human trafficking;
- all work performed is based on recognized employment relationship established through local laws and practice and entered into voluntarily;
- all work shall be voluntary and employees shall have the freedom to terminate their employment at any time as per the agreed notice period, without penalty or salary deductions;
- no personal documents or other belongings of the employees shall at any point be withheld during the employment or when the employment is terminated;
- no employees shall risk been charged, directly or indirectly, with any fees or commission related to the recruitment and/or employment process. If a recruitment agent has requested any such fee, the employee shall be reimbursed by the supplier;
- the supplier shall have routines and practices in place to minimize risks related to all forms of forced labour and human trafficking.

## No child labour

Child labour is not accepted. In particular, this means that

- suppliers shall never be involved in any practice inconsistent with the rights set forth in the Convention on the Rights of the Child.
- the minimum admission to employment or work shall not be less than the age of completion of compulsory schooling, normally not less than 15 years old.
- proof of age documentation for all employees must be in place.

## Health and safety is key

The supplier shall provide a safe, hygienic and healthy workplace. This implies, but is not limited to assuring

- building standards
- fire protection;
- site emergency plans;
- safety equipment;
- other necessary steps to prevent accidents and injuries arising out of, linked with or occurring during work as well as the spreading of disease;
- access to clean toilets and portable water;
- accident insurance to all employees, covering medical treatment for work related accidents and compensation for work related accidents resulting in permanent disability;
- that first-aid equipment shall be held accessible at the workplace;
- that employees shall be properly instructed as to the correct and safe use of machinery, equipment and any chemical substances

## Fair labour conditions

The supplier shall ensure fair labour conditions. In particular, the supplier shall ensure that

- all employees must not work more than the regular working- or overtime hours allowed by the laws of the manufacturing country;
- all overtime hours shall be consensual and compensated;
- a transparent and reliable system for recording of working hours and wages for all employees is kept;
- all employees are paid a wage equal to or exceeding the legal minimum wage according to local regulations and/or collective agreements and provide all legally mandated benefit;
- wage is paid timely and no disciplinary deductions from wages are allowed;
- at a minimum, provide all legally mandated benefits, including pension and holiday entitlements;
- employees are free to associate, form and to join, or decide not to join, trade unions or similar employee organizations and to bargain collectively. The employees' rights to strike or to initiate any other industrial actions under local law shall be recognized by the supplier. The lawful exercise of these rights shall never result in any repercussions from the supplier;
- the employees shall be entitled to breaks at regular intervals;
- all employees shall be treated with respect and the workplace shall be free from harassment (including sexual harassment);
- employees or hired workers shall never be subject to any discrimination based on gender, ethnicity, religion, age, disability, sexual orientation, pregnancy, marital status, physical ability, health conditions, nationality political opinion, trade union affiliation or group/social origin. The same shall apply with respect to any additional status protected under local law. The prohibition on discrimination applies in all aspects of employment, including hiring and promotion practices, compensation and benefits, workplace safety and discipline.

## Environmental impact

The supplier shall protect the environment and Nobia expects its suppliers to

- manage their operations responsibly in relation to environmental risks and impacts and to adopt a precautionary approach to their business operation;
- meet applicable regulatory requirements including air emissions, solid/hazardous waste and water discharge, chemical storage, waste recycling and disposal controls;
- have reasonable measures to mitigate negative operational impacts on the environment, setting and reporting against continuous improvement targets via an annual environmental performance report;
- obtain and maintain all required permits and license for its business;
- inform Nobia if significant incidents happen and how the supplier will handle the situation and prevent similar incidents in the future.

## Timber from sustainable sources

The supplier never buys or use timber that

- have been illegally harvested;
- come from forestry operations engaged in forest-related social conflicts;
- have been harvested in geographically identified Intact Natural Forests (INF) or High Conservation Value forests, unless they are certified as responsibly managed;
- have been harvested from natural forests in the tropical and sub-tropical regions being converted to plantations or non-forest use;
- comes from officially recognized and geographically identified commercial genetically modified (GM) tree plantations.

The supplier must have procedures in place to implement these standards throughout their supply chain and can track and report the origin of their wood. Traceability of product origin data shall be available for Nobia to compile and report.

## Business ethics and Anti-Corruption

The supplier shall conduct its business in an ethical manner. In particular, the supplier shall

- implement routines and processes to promote transparency;
- guarantee that no documents relating to the supplier's performance in accordance with the Code of Conduct are manipulated;
- not engage in any form of corruption, bribery, extortion or embezzlement;
- never offer or accept any benefits or other means to receive an improper advantage. Such benefit may comprise cash, gifts, trips or services and amenities of any nature. All gifts, payments or other commitments to customers, government officials and any other party must be in compliance with applicable anti-corruption laws.
- adhere to anti-trust and competition laws;
- respect intellectual property rights and safeguard confidential information against misuse, theft, fraud and inappropriate disclosure.
- suppliers shall avoid conflicts of interest that may compromise the supplier's credibility and disclose to Nobia information regarding potential conflicts of interest.
- adhere to international trade regulations and export control regulations.

## Audits and corrective actions

Nobia reserves the right, itself or through its appointed third party provider, to perform audits or inspections, at our own cost and upon reasonable notice, to verify compliance with the requirements set forth in the Code of Conduct.



In order to ensure and demonstrate compliance with the Code of Conduct, the supplier shall

- keep record of all relevant documents and provide supporting documentation upon request;
- secure the right to perform audits at its sub-suppliers to assure compliance with the requirements in the Code of Conduct.

If an audit reveals less than full compliance with the Code of Conduct, the supplier must take the necessary corrective actions without undue delay. The period to implement these corrective measures will be agreed upon with the auditors, but may not exceed twelve (12) months.

#### **Consequences in case of violations**

Nobia will base its supplier relations on dialogue and collaboration to fulfil the Code of Conduct. However, if the supplier fails to meet the requirements set forth in the Code of Conduct it shall be deemed to constitute a material contractual breach by the supplier and Nobia may, in Nobia's choice, and free of any obligation of paying penalties, damages or any other compensation or reimbursement to the supplier or its subcontractors, immediately cancel any or all orders and/or suspend, cancel or early terminate any or all contracts with the supplier (or parts thereof).

Nobia thanks you for complying with the Code of Conduct and joining us in our aim to create a better environment throughout our supply chain.