nobia







Supplier Code of Conduct

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Dear suppliers

Our business is built around something deeply human: the home and the planet we live on. For me, this is also what sustainability is about. I believe that the choices we make every day – how we work, how we treat one another and how we do business – shape the kind of company we are and the future we help create. And it starts with each of us. We care about the impact we make, inspire through our ideas and actions, and deliver on our commitments.



Our behaviour matters. Nobia's Code of Conduct acts as our compass to a clear ethical code and a culture of integrity. It serves as one of the most important building blocks of our governance framework.

Nobia is committed to conducting business responsibly and sustainably. Our business partners are an important part of our operations; hence, we expect you to respect and follow the principles of our Code of Conduct too.

This Supplier Code of Conduct ("Supplier Code") establishes the minimum environmental, social, ethical and governance requirements that Nobia expects all suppliers, contractors, subcontractors, consultants, labour providers and other business partners to meet.

Compliance with this Supplier Code is a prerequisite for establishing and maintaining a business relationship with Nobia. The requirements contained within this Supplier Code apply not only to the supplier but also to their subsidiaries, subcontractors, labour providers and other business partners involved in delivering products or services to Nobia.

Executive Summary

Suppliers shall establish governance structures, management systems and internal controls designed to keep up to date with any legal changes and to identify, prevent, mitigate and remediate environmental, social and governance risks throughout their operations and value chains.

Suppliers shall continuously improve their sustainability performance and support Nobia's ambition to create a responsible and sustainable supply chain.

Consequences of Non-Compliance

Compliance with this Supplier Code is a fundamental condition of doing business with Nobia.

Where non-compliance is identified, Nobia may require:

- root cause analysis and corrective action plans;
- remediation actions and follow-up reviews;
- additional audits.

Nobia reserves the right to suspend business activities, cancel orders or terminate agreements where serious violations occur, including but not limited to:

- forced labour;
- child labour;
- human trafficking;
- corruption;
- severe health and safety violations;
- deliberate environmental misconduct;
- repeated failure to remediate identified issues.

Standards the Supplier Code is based on

This Supplier Code is based on internationally recognised principles and frameworks, including:

- United Nations Universal Declaration of Human Rights (UDHR)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD MNE Guidelines)
- OECD Due Diligence Guidance for Responsible Business Conduct (OECD Due Diligence guidance)
- International Labour Organization Declaration on Fundamental Principles and Rights at Work (ILO Declaration)
- International Labour Organization Fundamental Conventions (ILO Fundamental Conventions)
- United Nations Convention on the Rights of the Child (UNCRC)
- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
- United Nations Global Compact (UNGC)
- Paris Climate Agreement
- Science Based Targets initiative Standards and Guidance (SBTi Standards and Guidance)
- Forest Stewardship Council Principles and Criteria (FSC)
- Programme for the Endorsement of Forest Certification (PEFC)
- Nordic Ecolabelling of Furniture and Fitments Product Group 031: Furniture and Fitments

Environment

Through environmental stewardship, we work together with suppliers to reduce the environmental footprint of kitchen products, achieve the Nobia's science-based climate targets, promote sustainably sourced wood and eco-labelled products, and improve resource efficiency throughout the value chain.

Environmental Management

Suppliers shall manage environmental impacts arising from their operations, products and services.

Suppliers shall:

- comply with applicable environmental legislation;
- maintain required permits and licences;
- identify environmental risks;
- monitor environmental performance;
- establish measurable improvement targets;
- maintain environmental records and documentation;
- provide environmental information to Nobia upon request;
- register products in the Nordic Ecolabelling Supply Chain Declaration Portal (SCDP) upon request.

Certification to ISO 14001 or equivalent environmental management systems is strongly encouraged. Suppliers are also encouraged to conduct life cycle-based assessments of the environmental impacts of their products. Environmental Product Declarations (EPDs) should be developed in accordance with ISO 14025 and the applicable Product Category Rules (PCRs). Where a product falls within the scope of EN 15804, the EPD should be prepared in accordance with the latest version of EN 15804.

Mitigate Climate Change

Suppliers shall support the objectives of the Paris Climate Agreement and Nobia's science-based targets validated by the Science Based Target initiative (SBTi) for climate action aligned with a 1.5^{o}C pathway.

Suppliers shall:

- measure and monitor greenhouse gas emissions;
- establish climate action plans;
- improve energy efficiency;
- transition towards renewable energy;
- establish reduction targets where material emissions exist.

Suppliers are encouraged to develop science-based targets aligned with the Paris Agreement.



Prevent Pollution and Restricted Substances
Suppliers shall prevent and minimize pollution and support the transition towards safer materials, reduced emissions and compliance with applicable environmental and product-related regulations.

Suppliers shall ensure that products and materials supplied to Nobia comply with all applicable requirements of:
• the EU Regulation (Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation (EC) No.1907/2006;
• the EU Classification, Labelling and Packaging (CLP) Regulation (EC) No. 1272/2008
• the EU Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS) Directive, including subsequent amendments, where applicable;
• applicable national chemical legislation;
• customer specific restricted substance requirements, such as but not limited to informing Nobia about content including any Substance of Very High Concern (SVHC), according to REACH, in products supplied to Nobia.

Protect Water and Marine Resources
Suppliers shall manage water responsibly.

Suppliers shall:
• monitor water consumption;
• reduce water intensity where feasible;
• prevent water pollution;
• manage wastewater responsibly;
• implement additional controls in water-stressed regions.

Protect Biodiversity
Suppliers shall actively protect biodiversity and natural ecosystems and support Nobia comply with the Nobia Wood Policy.

Suppliers shall:
• ensure deforestation-free products and mitigate all illegal deforestation;
• support responsible forestry practices;
• ensure traceability of timber and forest-derived materials;
• assess and mitigate biodiversity-related risks;
• comply with the EU Deforestation Regulation (EUDR) or EU Timber Regulation (EUTR) requirements, as applicable.
• procure wood and wood products originating from FSC- and/or PEFC-certified sustainable forestry
• report country of origin and certification specifications for wood products delivered to Nobia, upon request.

Suppliers are encouraged to certify their products in accordance with the most ambitious FSC and/or PEFC certification scheme available.

Promote Circular Economy and Resource Efficiency
Suppliers shall support the transition to a circular economy.

Suppliers shall:
• minimise waste generation;
• maximise reuse and recycling;
• improve resource efficiency;
• utilise recycled materials where feasible;
• reduce dependency on virgin materials;
• report share of recycled content for products delivered to Nobia upon request;
• comply with the EU Packaging and Packaging Waste Regulation (PPWR).



Human rights and labour standards

Through respect for human rights and fair labour practices, we work together with suppliers to create safe, inclusive and responsible workplaces across our value chains.

Human Rights Commitment
To avoid causing, contributing to or being directly linked to adverse human rights impacts.

Suppliers shall:
• identify human rights risks;
• pay particular attention to vulnerable stakeholders and the rights of Indigenous Peoples;
• assess impacts;
• implement mitigation measures;
• monitor effectiveness;
• provide or cooperate in remedy.

Eliminate Forced Labour
All forms of forced labour are prohibited.

Suppliers shall:
• apply the Employer Pays Principle;
• prohibit recruitment fees;
• protect migrant workers;
• prohibit debt bondage;
• ensure freedom of movement and freedom to terminate employment;
• conduct in accordance with the ILO Forced Labour Convention, 1930 (No. 29), ILO Abolition of Forced Labour Convention, 1957 (No. 105); ILO Protocol of 2014 to the Forced Labour Convention and the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons.

Eliminate Child Labour
Child labour shall not be used.

Suppliers shall:
• ensure the minimum age for employment to be the greater of:
- 15 years of age;
- the age for completing compulsory education; or
- the minimum age established under applicable national law.
• ensure hazardous work to never be performed by persons under 18 years of age;
• maintain documented age-verification procedures.
• conduct in accordance with the ILO Minimum Age Convention, 1973 (No. 138), ILO Worst Forms of Child Labour Convention, 1999 (No. 182) and the UN Convention on the Rights of the Child.



Secure Health and Safety
Suppliers shall maintain safe and healthy workplaces consistent with the ILO Fundamental Conventions, including the occupational health and safety principles.

Suppliers shall:
• conduct risk assessments;
• maintain emergency preparedness plans;
• investigate incidents;
• provide safety training;
• ensure machine safety;
• provide first aid resources;
• maintain adequate sanitation and potable water;
• comply with all national applicable occupational health and safety regulations;
• provide documented occupational health and safety routines and metrics to Nobia upon request.

Certification to ISO 45001 or equivalent Occupational Health and Safety Management Systems is strongly encouraged.

Uphold Fair Labour Conditions
Suppliers shall uphold fair and lawful labour practices and respect the rights and well-being of all workers.

Employment conditions must comply with applicable laws, regulations, and collective agreements, and support decent working conditions, fair treatment, and respect for internationally recognized labour rights.

Ensure Living Wages and Compliant Working Hours
Suppliers shall ensure that wages and benefits meet or exceed applicable legal requirements, collective agreements and industry standards. Wages shall be paid regularly, on time and in a transparent manner. Suppliers should progressively work towards providing a living wage, sufficient to meet workers' basic needs and provide discretionary income for workers and their families.

Working hours, overtime and rest periods shall comply with applicable laws, collective agreements and internationally recognised labour standards. Overtime shall be voluntary, properly compensated and not be used on a regular basis to compensate for inadequate staffing.

Promote Non-Discrimination and Inclusion
Suppliers shall promote equal opportunities, fair treatment and a workplace where all individuals are treated with dignity and respect.
Suppliers shall:
• provide equal opportunities and fair treatment to all workers in all aspects of employment, including recruitment, hiring, compensation, training, development, promotion, termination or retirement;
• not tolerate discrimination based on characteristics protected by applicable law, including gender, gender identity, age, ethnicity, race, nationality, religion, disability, sexual orientation, marital status, trade union membership, political opinion or social origin;
• maintain a workplace where all workers are treated with dignity and respect and that is free from harassment, bullying, intimidation, abuse, violence and retaliation.



Governance and business integrity

Through ethical business conduct, transparency and compliance, we work together with suppliers to build trust, safeguard integrity and promote responsible business practices across our value chains.

Uphold Legal Compliance
Suppliers shall monitor legal changes and at any time comply with all applicable laws and regulations.

Where differences exist between local law and this Supplier Code, suppliers shall apply the more stringent requirement wherever legally permissible.

Promote Fair Competition
Suppliers shall compete fairly and independently in the marketplace.

Suppliers shall:
• not engage in price-fixing, bid-rigging, market allocation or other practices that unlawfully restrict competition;
• comply with applicable competition and antitrust laws and regulations, including Articles 101 and 102 of the Treaty on the Functioning of the European Union (TFEU), where applicable.

Ensure Business Ethics and Anti-Corruption
Suppliers shall conduct their business with integrity, transparency and in compliance with applicable anti-corruption and anti-bribery laws and regulations.

Suppliers shall:
• prohibit all forms of bribery, corruption, fraud, extortion, embezzlement and facilitation payments;
• not offer, promise, give, request or accept anything of value in order to obtain an improper business or personal advantage;
• implement appropriate measures to prevent, detect and address corruption and other unethical business practices;
• maintain accurate and complete books, records and business documentation.



Safeguard Data and Cyber Security
Suppliers shall comply with the EU General Data Protection Regulation (GDPR) and applicable privacy legislation.

Suppliers shall maintain:
• cybersecurity controls;
• access management procedures;
• incident response plans;
• employee awareness programmes.

Significant cybersecurity incidents affecting Nobia information shall be reported without undue delay.

Source Responsibly
Suppliers shall source raw materials and services in a responsible manner and support transparency and traceability throughout their value chains.

Suppliers shall:
• ensure that raw materials are obtained from legal and responsible sources, aligned with Nobia policies;
• conduct risk-based due diligence regarding conflict-affected and high-risk areas.
• identify, prevent and mitigate risks related to human rights abuses, corruption, environmental degradation and illegal extraction, harvesting or trade of raw materials;
• maintain appropriate information regarding the origin and traceability of relevant raw materials and provide such information upon request;
• support compliance with applicable regulatory requirements related to responsible sourcing, including the European Union Deforestation Regulation (EUDR), where applicable;
• source wood to products supplied into Nobia in alignment with the Nobia Wood Policy.

Comply with Trade Laws and Sanctions

Suppliers shall comply with:
• United Nations sanctions;
• EU sanctions regulations;
• applicable export controls and customs legislation.

Speak-up and Protect Whistle Blowers
Suppliers shall establish confidential grievance and reporting mechanisms. These mechanisms should be aligned with the effectiveness criteria contained within the UN Guiding Principles on Business and Human Rights.

Suppliers shall:
• investigate reported concerns;
• document actions taken;
• prohibit retaliation;
• support appropriate remedy where impacts occur;
• communicate access to Nobia's Speak-up system to employees and sub-suppliers



Due diligence and transparency

Through transparency and effective due diligence, we work together with suppliers to identify and address sustainability risks, uphold human rights, support responsible business conduct and strengthen traceability across our value chains.

Conduct Due Diligence

Suppliers shall cooperate with Nobia's due diligence activities and provide relevant information required to support compliance with applicable human rights and value chain transparency best practice and legislation, including the Norwegian Transparency Act (Åpenhetsloven).

Suppliers shall establish and maintain due diligence systems aligned with:

- OECD Due Diligence Guidance;
- relevant OECD sector guidance;
- Corporate Sustainability Due Diligence Directive (CSDDD) and national transparency act requirements where applicable.

Suppliers shall:

- assess own and value chain risks;
- monitor supplier performance;
- document due diligence activities;
- implement mitigation measures;
- maintain corrective action plans.

The principles of this Supplier Code shall be communicated throughout the supplier's value chains.

Support Audits and Corrective Actions

Nobia reserves the right to conduct audits directly or through independent third parties.

Suppliers shall:

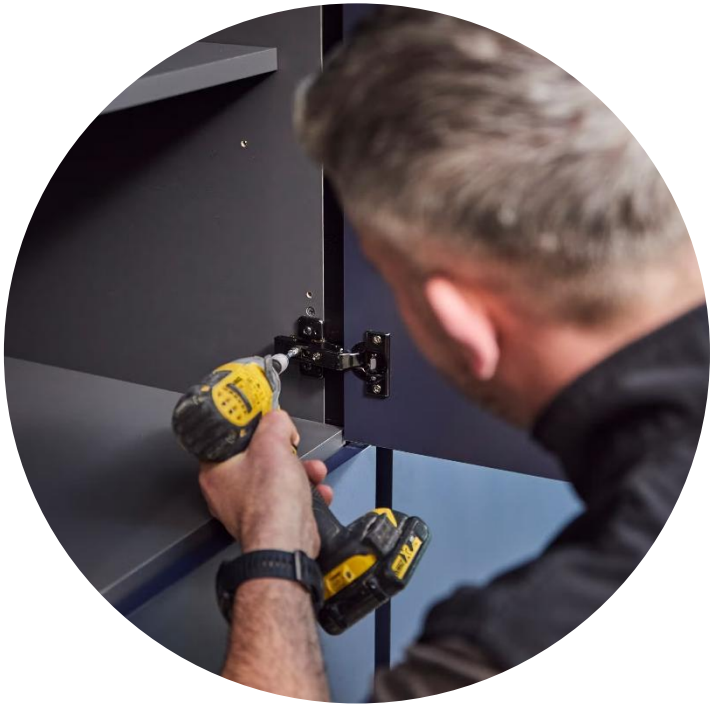
- cooperate fully;
- provide requested documentation;
- grant access to facilities where appropriate;
- implement corrective actions within agreed timelines.

Contribute to Sustainability Control and Reporting

Suppliers shall provide sustainability information upon request.

This may include, but is not limited to:

- third party verified life cycle assessment for Product Environmental Footprint, or data needed for assessment to be possible;
- detailed product information required to verify compliance with applicable laws and by Nobia applied certification schemes and public commitments;
- corporate Greenhouse Gas (GHG) emissions;
- traceability information, including country of origin for raw materials and countries of production;
- product certification registration numbers;
- source of energy and consumption, water use and waste generation;
- health and safety and labour metrics.



Policies and Contact

Main International Guidelines
United Nations International Bill of Human Rights www.un.org

International Labour Organization Declaration on Fundamental Principles and Rights at Work
www.ilo.org

United Nations Global Compact, Nobia is a member of UN Global Compact since 2020.
www.unglobalcompact.org

OECD's Guidelines for Multinational Enterprises
www.oecd.org

Associated Nobia Policies
Code of Conduct
Wood Policy
Environment and Climate Policy

Access the most recent version at www.nobia.com under "Sustainability/Governance"

Contact
info@nobia.com

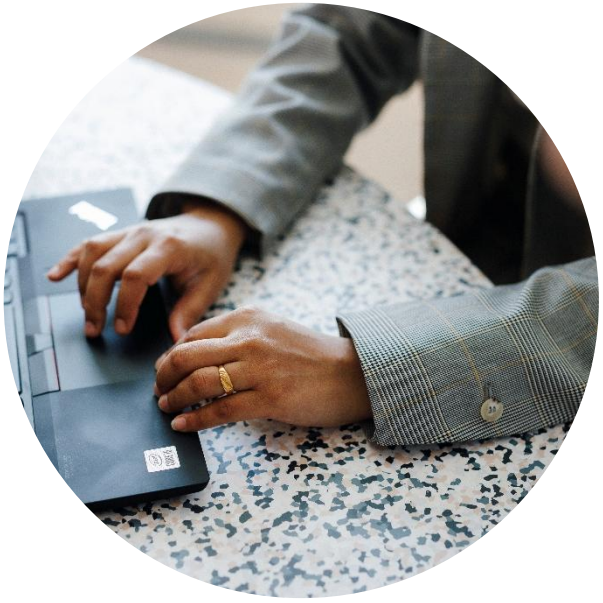
Nobia AB
Reg.No. 556528-2752

Nobia Speak-Up Channel
Access the Nobia whistleblower (SpeakUp) function, which is operated by an independent third party, at www.nobia.com under "Sustainability/Governance"

Governance of this Supplier Code
This Supplier Code of Conduct must be reviewed and approved by the Board of Directors of Nobia at least every two years. It may be amended at any time with the approval of the Chairman of the Board. In the event of any discrepancies between the English version and a translated version, the English version will be binding.

Effective date of current version: 2026-10-03

Version: 2.0
Owner: Nobia Board of Directors



Early reporting can help resolve an issue quickly and minimize harm.

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