

Modern Day Slavery and Human Trafficking Policy Statement for Nobia AB 2017-2018

This statement has been developed in accordance with the Modern Slavery Act 2015 and sets out Nobia Groups commitment and actions to understand prevent, as far as possible, the risk of modern slavery and human trafficking taking place anywhere in our operations or supply chains. Nobia Group has a zero-tolerance approach to Modern Slavery of any kind.

Structure of our business

Nobia is a leading European kitchen provider and its operations span the entire value chain, from development and manufacturing to distribution and sales. Kitchen solutions are sold under some twenty brands as well as under private labels. Nobia has production facilities in six European countries, where the kitchens are manufactured and assembled. Sales to private individuals are conducted through own stores and a network of franchise stores and retailers. Nobia's products are also sold to professional players such as construction companies and property developers. Our supply chain is global.

Policy framework

Corporate Responsibility is anchored in Nobia's corporate culture and is underpinned by a policy framework:

Code of Conduct

Our Code of Conduct govern all business and operations and is based on the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD guidelines for multinational enterprises.

Supplier code of conduct

Our supplier code of conduct is a binding part of our supplier agreement and regulates and govern Nobia's requirements on suppliers with regards to labour conditions, human rights, business ethics, environmental performance etc.

The nature of our operations and supply chain

Nobia is organized so that the first stages of the value chain; product development, sourcing, production and logistics have Group-wide management functions. The group wide structure enable capitalization on scale and the possibility to a harmonized and structured approach to risk assessment and due diligence.

Our production facilities are in Sweden, Norway, Finland, Denmark, UK and Austria. In total Nobia has around 6000 employees of which about half work in administration and sales and half in production and logistics. Nobia mainly has permanent employees, with only around 1 per cent of employees being temporarily employed.

Our supply chain extends from our home markets into other geographical regions. We understand that our biggest exposure to Modern Slavery is in our supplier's operation (i.e. in our sourcing), hence, we are taking several steps to mitigate the risk of modern slavery in our supply chain.

Due diligence

Our group wide Code of Conduct govern all business and operations. The Code contains principles governing, among other things Modern Slavery. To ensure compliance with the Code of Conduct, an anonymous communication channel has been established to report suspected breaches of the Code. All managers have been trained in our Code of Conduct to assure implementation of the Code throughout the organization.

Nobia's Product Quality Assurance team is specialized in conducting supplier audits in line with Nobia's supplier audit requirements as well as the assessment and development of new suppliers. Furthermore, Nobia's group sourcing organization works closely with suppliers to promote sustainable and responsible supplier relations in line with Nobias requirements.

Nobia undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. We understand that Modern Slavery risk is not static, and will continue to develop our practices to, as far as possible, prevent any form of modern day slavery in our supply chain and operation. Nobia's due diligence and review process of suppliers includes a comprehensive supplier approval where the supplier's compliance with Nobia's requirements, with regards to, amongst other things, modern Slavery. Nobia also carries out assessments and audits to assess compliance and identify any Modern Slavery practices. If issues were to be identified, appropriate investigative and remedial actions will be taken.

Next step

During the end of 2016 we developed a new Supplier Approval Form (SAF) based on algorithms to make the approval process more objective. The SAF is an extensive risk assessment evaluating primary suppliers and secondary suppliers with regards to, among other things, modern slavery. During the end of 2016 we have also developed a new supplier code of conduct, further establishing Nobia's requirements on suppliers with regards to labour conditions, human rights, business ethics and environmental performance. During 2017, a comprehensive implementation process will be put in place to intensify the risk assessment of and dialogue with our suppliers.

This statement was approved by the Board of Directors of Nobia AB in April 2017.

Signed



Morten Falkenberg
CEO Nobia AB
April 2017