

# NORDIC CLIMATE GROUP

## Supplier Code of Conduct

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## 1. Introduction

The Supplier Code of Conduct (“**Supplier Code**”) applies to all suppliers that deliver goods and/or services to Nordic Climate Group, including [any parent, subsidiary or affiliate entities as well as] their respective employees and agents (hereinafter individually and collectively referred to as “**Supplier**”).

For the purpose of this Supplier Code of Conduct agents, intermediaries, contractors and consultants are also referred to as Suppliers.

If you have any questions about the content of this Supplier Code of Conduct, please reach out to Group CEO at Nordic Climate Group.

## 2. Implementation and compliance with the Supplier Code

Suppliers are expected to adhere to this Supplier Code. Nordic Climate Group monitors compliance as described below in Section 8 (*Monitoring and Enforcement*). Suppliers must ensure that relevant employees and other workforce are aware about the content of this Supplier Code and are recommended and encouraged to implement equivalent requirements on their own suppliers.

The Supplier Code contains “Requirements” that Suppliers are expected to comply with and “Recommendations” that Suppliers are encouraged to comply with or implement. Additional Supplier specific requirements related to the areas in this Supplier Code may be defined in commercial agreements with specific Suppliers.

## 3. Legal compliance

Suppliers must stay up to date, and comply with, national and regional legislation as well as relevant and applicable international regulations and conventions related to all the areas in the Supplier Code.

Where the requirements in the Supplier Code are stricter than local laws, the requirements of the Supplier Code must be applied. In the event of actual or potential contradictions between the Supplier Code and applicable laws and regulations, Suppliers must notify Nordic Climate Group.

## 4. Human rights

### *Requirements*

- Support and respect the protection of internationally proclaimed human rights.
- Be aware of and address any actual or potential negative human rights impacts that they cause or contribute to, or that is directly linked to their operations, products or services.
- No allowance or tolerance for any form of modern slavery, including forced labor, in own operations or through value chain.

- Prevent all forms of child labor and respect children’s right to personal development and education. The minimum working age is 15 years or the legally prescribed minimum work age, if higher.

## **5. Labor standards**

### ***Requirements***

- Ensure that all employees and individuals working under the control of Supplier are offered a safe and healthy workplace.
- Commit to zero fatalities at the workplace as well as high-consequence work-related injuries or ill health amongst employees.
- Ensure that a regular working week complies with relevant international labor standards.
- Pay wages and benefits at a minimum according to applicable laws, industry standards and relevant collective agreements, whichever is higher. Wages must be enough for employees to meet basic needs and to provide for some discretionary income (so called “living wage”).
- No tolerance for discrimination at the workplace against anyone (employee or business relation representative) based on age, race, gender, religion, ethnicity, sexual orientation or disability or other relevant characteristics.
- Respect employees’ freedom of association and employees’ rights to collectively bargain with Supplier.
- Treat employees equally, according to their abilities and qualifications.

### ***Recommendations***

- Take active measures for employee wellbeing.
- Provide health insurance and extended income security and social benefits, even in jurisdictions where Suppliers are not required to do so.
- Where needed, we seek to facilitate other forms of worker representation than collective bargaining.
- Promote diversity by striving to reflect the societies where Suppliers operate and promote various aspects of diversity including gender, age, ethnicity, skills, experiences, culture, and personality or other relevant characteristics.
- Contribute to the positive social and economic development of the communities where Suppliers operates and minimize any negative social impacts of its operations on those communities.

## 6. Business ethics

### *Requirements*

- Prohibit all forms of corruption and bribery including extortion and facilitation payments.
- Ensure that employees of Supplier avoid all conflicts of interest that may impact – or appear to impact – Nordic Climate Group.
- Business decisions relating to Nordic Climate Group must remain independent from any consideration that does not involve the business at hand and cannot be influenced by private interests.
- Implement measures to prevent the risk of becoming involved in unethical, illegal or criminal activities such as money-laundering or terrorist financing or engagement with business partners that are the target of economic sanctions or export control laws.
- Comply with relevant export controls and sanctions laws and regulations, including United Nations sanctions and applicable sanctions under the laws of the European Union, the United States (including but not limited to the U.S. Department of the Treasury’s Office of Foreign Assets Control), and the United Kingdom.
- Comply with the principles of free enterprise and fair competition, including ensuring that no employees engage in discussions or agreements with competitors regarding price fixing, market sharing, bid rigging, or similar.
- Protect Nordic Climate Group’s personal data from any improper disclosure, theft or misuse at all times and respect the right to information and privacy of end users.
- Pay the right amount of tax, in the right place, at the right time.

### *Recommendations*

- Implement a code of conduct or code of ethics.
- Provide employee training on areas covered by this Supplier Code.

## 7. Environment and climate change

### *Requirements*

- Identify actual and potential main material environmental and climate impacts from their operations, including products and services, and take appropriate and reasonable measures to prevent or minimize such negative impact.

### *Recommendations*

- Support the Paris Agreement commitment to mitigate climate change by keeping the global temperature rise below 1.5 degrees and implement measures supported by

science-based targets to reduce greenhouse gas emissions in operations and reach net zero by 2050.

- Wherever possible promote and contribute to: climate change adaptation; the sustainable use and protection of water and marine resources; the transition to a circular economy; pollution prevention and control; and the protection and restoration of biodiversity and ecosystems,
- To work continuously and systematically towards better environmental performance by setting targets, measuring, and reporting on progress on all areas of materiality.

## 8. Monitoring and enforcement

If a Supplier becomes aware of any violations of this Supplier Code it is expected to inform Nordic Climate Group without undue delay. Following a violation, Supplier will be given the opportunity to remedy any such violations. If Supplier does not inform Nordic Climate Group about the violation or does not remedy an acknowledged violation, Nordic Climate Group has the right to take legal action including the right to terminate the commercial agreement between Nordic Climate Group and Supplier.

Nordic Climate Group must have the right to and may verify Supplier's compliance with the requirements in this Supplier Code by means of dialogue, self-assessment questionnaire or on-site audits. Nordic Climate Group must also have the right to conduct interviews with Supplier's employees and gain access to relevant, accurate and complete documentation and records related to this Supplier Code. Audits may be carried out by Nordic Climate Group or an independent third party appointed by Nordic Climate Group. Nordic Climate Group acknowledges that its audit rights including access to documentation and records may be restricted due to Supplier's legal or contractual obligations.

Effective date	Version	Change description
2023.09.01	V 1.0	