

Policies for Nordic Climate Group

Group management in Nordic Climate Group (“NCG”) is responsible for establishing, implementing, complying with and maintaining NCG's policies. Each employee, manager, executive officer and member of the board of directors must understand and comply with this set of corporate policies. This document summarizes key aspects of each policy document. You can find the complete set of NCG’s policies on our website or access through your Country Manager or Group CEO.

Code of conduct

- We aim to create a culture with conditions for all employees to feel welcome, valued and included.
- Our ambition is that the work environment of our business partners is safe and healthy.
- NCG ensures that a regular working week complies with relevant international labour standards and country regulations.
- We do not tolerate discrimination or harassment against anyone (employee or business relation representative) based on age, race, gender, religion, ethnicity, sexual orientation or disability or other such characteristics. Similarly, we do not tolerate any form of harassment including violence, sexual harassment, punishment, or abuse of any kind. And no tolerance for child labour or forced labour.
- Business ethics
 - No tolerance for corruption and bribery.
 - No conflicts of interest or proper handling if occurring.
 - Transparency with financial activities and comply with anti-money laundering practices.
 - Compliance with trade restrictions and sanctions.
 - Strive for fair competition in all our business activities.
 - Safeguards information security and protection of privacy.
 - Sustainable tax practices.
- Environment
 - High environmental ambition and strong respect for climate actions.
- Responsibility and implementation
 - Each employee, manager, executive officer and member of the board of directors must understand and comply with this Code of Conduct.
- Reporting concerns and consequences of violation.

Supplier Code of Conduct

- Applies to all suppliers providing goods and services to Nordic Climate Group.
- Suppliers shall comply with applicable laws and regulations and respect internationally recognised human rights and labour standards.
- Zero tolerance for child labour, forced labour, discrimination, harassment, bribery, facilitation payments and other unethical business practices.
- Requirements for safe and healthy working conditions, as well as respect for freedom of association and the right to collective bargaining.

- Suppliers shall comply with competition law as well as applicable sanctions and export control regulations.
- Suppliers are expected to work to identify and reduce negative environmental and climate impacts in their operations.
- Nordic Climate Group reserves the right to monitor compliance and expects any violations to be reported without undue delay.

Policy against bribery and corruption

- Zero tolerance for bribery, facilitation payments and unethical transactions.
- Zero tolerance för unethical hospitality, events, gifts, donations, sponsorships and political contributions.

Competition policy

- We believe in fair trade and honest competition based on integrity, product quality, price and customer service. It is NCG's policy to ensure that its business practices comply fully with the antitrust laws of every country it operates in.

Environmental Policy

- NCG complies with all applicable and relevant environmental and climate legislation as well as other environmental or climate standards and requirements that apply to the business.
- We are committed to combating global warming in our operations and supply chain and we are committed to the Science Based Target Initiative's (SBTi) business ambition for 1.5°C.
- The goal is for all customers to be offered solutions with natural refrigerants where possible. For new installations, we must offer solutions with natural refrigerants. For customers with existing cooling systems, we must focus on preventive work to minimize leakage, minimize energy consumption and inform about what replacement of systems with natural refrigerants means.
- The group's purchasing function works with the guidelines set out in the sustainability report and environmental policy.

Data Protection Policy

- The Data Protection Policy is designed to help us comply with the European General Data Protection Regulation (the "**GDPR**").
- We can only process personal data if it identifies specific legal grounds permitting such processing.
- NCG must ensure compliance with applicable data protection legislation (including GDPR) each time personal data are processed.
- We continuously update registers with personal data to ensure that only relevant data is available.
- Whenever we enter a relationship with a third party that involves the exchange or transfer of personal data, we must enter into a written agreement with the third party.

Trade Compliance Policy

- NCG is required to conduct sanction screenings of its business partners, in particular with respect to business partners or transactions assessed to be of higher risk, for instance due to the involvement of a risk country.
- We shall regularly perform risk assessments of its operations and products to identify and map its risk exposure under sanctions and export control laws.

Whistleblowing Policy

- Anyone who discovers wrongdoing by NCG or any of its employees, consultants, contractors or suppliers can report such wrongdoing without risk of reprisal or discrimination.
- All whistleblowers can report information about work-related irregularities, where there is a public interest in their being remedied.

Managers should ensure that their teams fully understand and are expected to comply with the standards and requirements stipulated in these corporate policies.

Board of Directors and Management team of Nordic Climate Group