



NTE's ethical guidelines for suppliers

NTE is responsible for the societal consequences arising from the Group's activities, both in terms of environmental impact, working conditions and other social conditions. Responsibility goes through the entire value chain in our business and also includes our suppliers.

In all procurement, NTE's internal guidelines impose on the supplier, supplier's employees and others representing the supplier to respect international obligations such as human rights and international standards in the workplace. Our ethical guidelines for suppliers clarify our position to our suppliers, employees and other stakeholders. The guidelines impose strict requirements on suppliers, subcontractors and manufacturers, including labour and environmental considerations, and other ethical dimensions in accordance with international conventions set by the ILO and UN.

The document describes minimum standards expected by all NTE suppliers, subcontractors and manufacturers. Suppliers shall ensure that subcontractors also comply with these minimum standards.

Each supplier is also responsible for complying with laws and regulations in the countries affected by the deliveries to NTE and in other countries they conduct business activities.

The content of the guidelines is not debatable and will be followed by our suppliers, subcontractors and manufacturers throughout the value chain. NTE will not terminate cooperation as a result of breach of these guidelines before a plan for improving relationships has been presented and discussed.

NTE or a third party on behalf of NTE may execute checks at the supplier to assess the extent to which the supplier / manufacturer meets the ethical requirements or the extent to which the supplier has fulfilled the requirements.

NTE's policy for suppliers is part of NTE's work to promote ethical trade, and can be conveyed to subcontractors as a separate document. All NTE employees who have contacts with suppliers shall ensure that they know and understand the applicable guidelines.

Conditions in the workplace

1. Wages (ILO convention 131)

- 1.1. Wages to workers must be at least in line with national minimum wage provisions or industry standards, and always sufficient to meet basic needs.
- 1.2. Salary and payroll shall be agreed in writing before work commences. The agreement shall be understandable to the employee.
- 1.3. Employees of subcontractors shall under no circumstances be obliged to pay part of their wages from supplier back to their employer.
- 1.4. Deduction in salary as a disciplinary reaction shall not be allowed.

2. Working hours (ILO convention 1 and 14)

- 2.1. Working hours shall be in accordance with national laws or industry standards and may not exceed working hours in accordance with applicable international conventions. This applies to weekly working hours, free weekday breaks, overtime restraint and right to overtime allowances.

3. Health Safety and Environment (ILO convention 155 and recommendation 164)

- 3.1. Employees in companies that are suppliers, subcontractors and / or manufacturers of NTE equipment and services shall have a safe and healthy working environment. This means that HSE measures are to be implemented to reduce the risk of accidents and health damage. Employees shall regularly receive documented training in HSE.
- 3.2. Workers must have access to clean sanitary facilities, clean drinking water and, where appropriate, safe food storage

- 3.3. If the employer places lodging at the employee's disposal, this must be clean, safe, adequately ventilated and with access to clean sanitary facilities and clean drinking water.
 - 3.4. Physical abuse, punishment or threat of physical abuse shall be prohibited. The same applies to sexual or other abuse, and various forms of humiliation.
4. **Freedom of association and collective bargaining** (ILO conventions no 87, 98, 135 and 154)
 - 4.1. Workers, without exception, shall be entitled to join or establish unions of their own choice and to bargain collectively.
 - 4.2. The employer shall not discriminate against union representatives or prevent them from performing their trade union work.
 - 4.3. If these rights are limited by law, the employer shall facilitate and, not in any event, prevent parallel mechanisms for free and independent organization and negotiation.
5. **Child labour** (UN convention on the Rights of the Child, ILO conventions no 138, 182 and 79, recommendation no 146)
 - 5.1. Children under 18 years of age should not carry out work that endangers health or safety, including night work.
 - 5.2. Children under 15 years (14 or 16 years in certain countries) shall not perform work that may be detrimental to their education.
 - 5.3. NTE does not accept recruitment of child labor. If the supplier / subcontractor / producer undertakes child labor in violation of these conventions, it shall be terminated as soon as possible. At the same time, it is to be ensured that the children are given the opportunity for life and education until the child is no longer in school age.
6. **Regular employment**
 - 6.1. Commitments to workers, in accordance with international conventions and / or national laws and regulations on regular employment, shall not be circumvented through the use of short-term commitments (such as the use of contract workers, and day laborers), subcontractors or other employment relationships.
 - 6.2. All workers are entitled to work contracts in a language they understand.
 - 6.3. Apprenticeship programs must be clearly defined with regard to duration and content.
 - 6.4. There shall be no form of forced labor and employees shall be free to terminate their employment with reasonable notice.
 - 6.5. Employees may not provide a deposit or identity documents to the employer and shall have full opportunity to terminate their employment with reasonable notice.
7. **Discrimination** (ILO conventions no 100 and 111 and the UN Convention on the elimination of all forms of discrimination against women)
 - 7.1. No one shall be discriminated against because of ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
 - 7.2. Employees shall be protected against sexually intrusive, threatening, abusive conduct and against discrimination or termination on unfair grounds.

Conditions outside the workplace

8. Environment

- 8.1. NTE, as a renewable company, will ensure that sustainability is a part of the entire group's business. This means that we will be a driving force for green growth and that we will take care of climate and environment in our decisions and projects.
- 8.2. This requires that suppliers also take environmental considerations throughout the production and distribution chain, based on both local, regional and global environmental aspects, eg. loss of biodiversity, long-term damage to ecosystems, pollution that may affect the climate or damage caused by the use of chemicals. Suppliers shall ensure acceptable waste management and phasing out the use of non-renewable resources. No local overexploitation shall be carried out on the site at the place of production, and it shall be taken care of so that it does not get damaged by pollution.
- 8.3. National and international environmental legislation and regulations must be observed.
- 8.4. Relevant emission permits must be obtained where necessary.
- 8.5. Harmful chemicals and other substances must be managed in a proper manner.

9. Bribery and corruption

- 9.1. NTE sets high ethical requirements for its own employees and others acting on behalf of the company. Likewise, vendors must maintain a high ethical standard and good business practice. Applicable laws and other legal provisions and agreements must be followed. However, high ethical standards require more than just following the law in the literal sense. Suppliers cannot provide or receive any goods that can be considered as unacceptable reward for obtaining, retaining or managing business activities. Such benefits may, for example, be cash, goods, travel or other services.

10. Marginalized population groups

- 10.1. Production and the withdrawal of raw materials for the production of goods included in the delivery to NTE shall not help to destroy resource and / or income margins for marginalized populations, for example by seizing large land areas or other natural resources that these populations depend on.

11. Money laundering and financing of terrorism

- 11.1. NTE shall ensure that all employees and suppliers adhere to standards in preventing money laundering and terrorist financing. We expect that our employees and suppliers, including their owners, affiliated companies, directors, employees, agents, and representative:
 - i. Conduct all activities in accordance with applicable anti-money laundering laws and regulations.
 - ii. Refrain from concealing or obscuring the origin, source, location, disposition, movement, or ownership of any property, especially when suspected to be the proceeds of criminal activities.
 - iii. Refrain from engaging in transactions with, or providing resources or support to, individuals or organizations associated with terrorism.

12. We Respect the Confidentiality of Information

- 12.1. Our customers and colleagues trust us with their personal and confidential information.
- 12.2. We ensure that we live up to that trust by respecting and safeguarding their privacy.
- 12.3. We take great care to maintain the confidentiality of personal information and process it only to the extent needed for legitimate business purposes in accordance with applicable legislation and regulations.
- 12.4. We make privacy and personal data protection a core consideration in everything we do. This requires all our services to include privacy by design. We maintain transparency by making information available to our customers and employees on how their personal data is used. In addition, we provide them with meaningful choices on how to control their data
- 12.5. We do not share personal data to third parties without the written consent of the person who is protected, or where this is authorized by law, agreements or regulations.
- 12.6. When the supplier processes personal data on behalf of the purchaser as part of the contract, the supplier assumes the role of a processor, while the purchaser acts as the controller, as defined by applicable data protection laws and regulations.

13. Supplier's responsibilities as Processor:

- 13.1. The Supplier guarantees compliance with all relevant data protection laws and regulations.
- 13.2. Personal data will not be processed by the Supplier without the written consent of the Purchaser.
- 13.3. This consent may be subject to the Purchaser's standard information management agreement.
- 13.4. If applicable, a controller-to-processor data transfer agreement based on the standard contractual clauses issued by the EU Commission will be established.
- 13.5. When sub-contractors are involved in Contract performance, the Supplier ensures that they also comply with relevant data protection laws and obligations.
- 13.6. In cases where the Purchaser and Supplier independently decide on the purposes and methods of processing personal data, both parties act as controllers. If necessary, a controller-to-controller data transfer agreement based on EU Commission standard contractual clauses will be put in place.