

Norican Group Supplier Code of Conduct

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Overview

This Supplier Code of Conduct summarizes the supplier related elements from Norican Group’s Code of Conduct as well as Norican’s Procurement policy.

The requirements set out in this Code of Conduct must be implemented in Norican suppliers’ supply chain. Suppliers’ approval (by signing this document) obligates the suppliers, own organisation to pursue such implementation.

The Norican Group Code of Conduct is guided by our four Norican Values.

Part of our values is to treat suppliers fairly and consistently and increase profits in a sustainable and ethical manner.

Norican evaluates suppliers on a number of parameters. We expect our suppliers to act in a way that is consistent with this Code of Conduct. Actively working with this Code will be a key parameter in the supplier evaluation.



Compliance with Law



As a Norican supplier you must follow the applicable laws and regulations of the countries where you operate. If there is any conflict or ambiguity between local laws or regulations and this Code, then you must apply the higher standard.

- not discriminate against anyone, particularly on the grounds of race, gender, sexual orientation, religion, disability or age.
- treat everyone equally, regardless of their association or participation with a workers' organisation or trade union, and not prevent collective bargaining.
- recruit, reward and develop employees on merit and have an equal pay policy.
- have consideration and regard for beliefs and opinions which may differ from your own.

Health and Safety



As a Norican supplier you must create and implement your own health and safety rules and procedures to:

- ensure that your production equipment is safe and complies with local regulations.
- work in a way that protects the health and safety of your employees and those you encounter.
- promote a culture of safety and good health.

Labour Conditions



People play a vital role in the success of Norican's processes, and we expect our suppliers to share and support this idea. Suppliers should provide employees with fair working conditions concerning topics of wages, working hours, benefits, overtime processes and hiring practices. In particular, Norican expects its suppliers to:

- comply with all labour laws and regulations, including but not restricted to those applicable to compensation and working hours.
- respect the rights of employees to freely associate and bargain collectively.

Diversity and Inclusion



We all have a responsibility to create a culture where all employees feel respected and valued, and where they are able to contribute fully to their workplace, free from discrimination or harassment.

As supplier, you must:

- treat all employees and others you meet in the course of employment, fairly, with dignity and respect.
- support diversity within the workplace.

The Environment



At Norican, we are committed to managing our impact on the environment and will comply with all applicable environmental laws and regulations. As you are part of our supply chain, we therefore ask you to:

- comply with all environmental laws and regulations.
- minimize waste at your sites and recycle where possible.
- dispose of hazardous waste in a responsible manner.
- prevent spillage and avoid contamination of the water supply.
- source raw materials in a responsible way.
- minimize carbon footprint and avoid air travel where possible.
- inform Norican about environmentally friendly production technologies if we are not utilizing them.

Modern Slavery, Human Rights



Norican has a zero-tolerance approach to modern slavery, including forced labour, human trafficking, and child labour. As our supplier you must:

- only employ workers who meet the minimum applicable legal age requirement.
- set employee working hours, pay and benefits in compliance with all applicable laws.
- comply with internationally proclaimed human rights and organise training for managers on working conditions and human rights.
- investigate further if you suspect inappropriate working conditions, modern slavery or child labour is involved in your supply chain.

Confidential Information



As a supplier to Norican you will often come across confidential information and data/specifications with intellectual property rights. All this information should be safely guarded and as a supplier you must:

- sign a Non Disclosure Agreement with Norican and with your suppliers.
- refrain from using Norican and Norican company brand names as references unless agreed in writing with Norican.
- protect your systems against cybercrime.

Anti-Bribery, Anti-Corruption, Gifts and Hospitality



Aside from being fundamentally wrong, bribery and corruption are also criminal offences, conviction for which is punishable by up to ten years' imprisonment for individuals, and unlimited fines for businesses.

If a business is found to have taken part in bribery or corruption, it can be excluded from tendering for public contracts and will seriously damage its reputation. We therefore take this very seriously and have a zero-tolerance approach to bribery and corruption.

As a Norican supplier you must:

- comply at all times with local laws on anti-bribery, anti-corruption, gifts, and hospitality.
- not offer, or make facilitation or 'grease' payments, regardless of local custom or practice.
- not offer or make any payment to an intermediary or third party when we know, or can be substantially certain, that it will be used to make an improper payment.
- only accept or offer gifts of a modest value, and when it is lawful to do so, and where it cannot be construed as being capable of influencing any business decision.
- not make political donations or contributions on behalf of Norican.

Financial Integrity



Suppliers shall operate their business honestly and transparently. Norican expects suppliers to maintain all financial books and records in conformance with generally accepted accounting principles.

As a preventative measure against corruption, bribery, embezzlement and extortion, we request suppliers to keep an appropriate accounting records system that enables the traceability of financial decisions.

Fair Competition



In their dealings with competitors, organizations have the responsibility to respect rules and laws of fair competition. As a Norican supplier, you must prohibit collusion and other activities aimed at influencing prices or conditions, dividing up sales or customers territories, as well as any activities aimed at inhibiting free and open competition.

Conflict Minerals



In politically unstable areas, armed groups often use forced labour to mine minerals. They then sell those minerals to fund their activities, for example to buy weapons. These so-called 'conflict minerals', such as tin, tantalum, tungsten and gold, can find their way into our supply chain if we do not act on it.

As a Norican supplier you must:

- Exercise due diligence to ensure that your material suppliers do not source materials from conflict areas.
- Comply with the EU Conflicts Minerals Regulation (2021), and/or the US Dodd-Frank Act on Conflict Minerals (2012).

Whistleblowing



We encourage suppliers to provide an anonymous complaint mechanism for managers and employees to report ethical violations, such as violations to this Code of Conduct. When doing so, suppliers shall protect whistle-blowers' confidentiality and prohibit retaliation.

Norican Supplier Code of Conduct hereby accepted by:

Acceptance and signing

Supplier company name:

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Norican representative name:

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Legal address:

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Norican representative signature:

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Date:

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Name:

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Signature:

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Date:

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