



## Code of Conduct for NG Group's Business Partners

NG Group is a leading Nordic provider of recycling and environmental services with a leading service offering covering the whole waste value chain.

NG Group is committed to sustainability and responsible business conduct in all its operations. NG Group's business partners play an important role in our effort for sustainable business conduct. Our goal is to develop relationships with Business Partners that share similar corporate values as NG Group and conduct business in an ethical manner.

### UNDERSTANDING OUR BUSINESS PARTNERS CODE OF CONDUCT

This Business Partners Code of Conduct (the **Code**) is applicable to all of NG Group's Business Partners, including but not limited to suppliers, distributors, agents, resellers, joint venture partners, customers, and strategic partners. This Code applies to all individuals and companies with which NG Group has a business relationship, regardless of their nature, type of transactions or duration. This includes companies of all legal types, ownership structures and jurisdictions in which they are incorporated.

The purpose of this Code is to define the basic sustainability requirements placed on NG Group's Business Partners. The Code is based on the principles of the United Nations Global Compact and is divided into four sections: business principles, human rights, labor standards and environment.

NG Group's Business Partners are obliged to implement the principles of this Code in all their business activities. Business Partners shall also comply with any additional requirements agreed in the contract documents. Business Partners are expected to have appropriate management systems in place to ensure compliance with this Code, proportionate to the size, complexity, and risk environment of their business. Business Partners are also responsible for ensuring and monitoring their business partners' compliance with this Code and are not allowed to outsource work unless approved in advance in writing by NG Group.

NG Group's Business Partners shall confirm compliance with this Code by continuously documenting compliance, providing information to NG Group on request. NG Group has a strict policy with regards to behavior that is in breach with the provisions of the Code. In the event that the Business Partner fails to comply with the Code or becomes suspicious about a potential breach of the Code, the Business Partner shall immediately inform NG Group in writing and start a process to become compliant. Material breach of the Code or repeated refusal to provide the required information may lead to the termination of cooperation with NG Group.

NG Group's Business Partners should report any suspected violation of the Code to their NG Group contact person or through NG Group's whistleblowing channel available on NG Group's website.

## BUSINESS PRINCIPLES

### General

NG Group's Business Partners shall comply with all the applicable laws and regulations in all locations where they conduct their business. In addition, all Business Partners are expected to act in accordance with the highest business ethics standards. NG Group reserves the right to conduct onsite audits of the Business Partners, either with internal resources or with use of an external auditing company, and to demand rectification of any discrepancies.

### Anti-corruption, anti-bribery, and anti-money laundering

The highest standards of integrity are to be expected from NG Group's Business Partners, including its sub-business partners, and other entities acting on behalf of the Business Partners, in all business interactions. Any form of extortion, bribery, or corruption, including improper offers of gifts, services and/or payments to or from legal entities, organizations, employees, representatives, partners, or others closely associated persons, is prohibited. Business Partners shall establish and maintain policies and procedures designed to prevent bribery, corruption, and money laundering. Business Partners shall not provide NG Group representatives with any gifts or hospitality in any situation in which it might influence, or appear to influence, a representative's decision in relation to the Business Partner. Business Partners shall avoid any conflict of interest between the Business Partner and NG Group. Business Partners shall avoid any form of terrorist financing.

### Sanctions compliance

Business Partners shall comply with all applicable laws and regulations regarding export control and export restrictions, as well as economic sanctions imposed by the EU, US, UK or UN directed towards individuals and companies (e.g., trade embargoes, import and export restrictions, sector measures and/or financial restrictions). Business Partners cannot be listed on any sanctions or export control list issued by any sanction authority relevant to NG Group or the Business Partner, including the EU and its member states, the UN, the UK, the US, and Norway. Further, Business Partners cannot be owned, controlled or act on behalf of any person or entity designated on a sanctions list, including a person or entity owned (50% or more) or controlled by a person or entity designated on a sanctions list.

### Integrity and accuracy of information, privacy, and fair competition

Business Partners agree to safeguard the security of NG Group's information and confidentiality of information, and to handle personal and other data appropriately, in accordance with applicable laws and regulations. Statements to media, marketing and/or publications of agreements entered with NG Group must be approved in advance by NG Group, in writing. Business Partners shall issue accurate and relevant financial and other information about their business operations, conduct responsible marketing, and compete fairly and ethically in all other respects. Business Partners shall avoid participation in any form of price fixing or market sharing, and any breach of competition laws and regulations shall be immediately notified to the relevant authorities and NG Group.

## HUMAN RIGHTS

NG Group's Business Partners shall recognize, and respect internationally proclaimed human rights that are expressed in e.g. the International Bill of Human Rights and the UN's Universal Declaration of Human Rights, and ensure they are not involved in human rights violations. Business Partners shall identify their human rights impacts, implement mitigation actions when required, and provide remedial action in the event of human rights violations.

## LABOR STANDARDS

### Freedom of association

NG Group's Business Partners shall recognize and respect employees' freedom of association and their right to freely choose their representatives. Business Partners shall also recognize and respect employees' right to collective bargaining. Business Partners shall not discriminate against employees' representatives or members of trade unions or restrict their ability to carry out their representative functions in the workplace.

### Prevention of forced labor

NG Group's Business Partners shall not use forced labor, and employees shall be free to leave their employment after reasonable notice as required by national law or contract. Employees shall not be required to lodge deposits of money or identity papers with their employer.

### **Wages and working hours**

NG Group's Business Partners comply with national and local laws and agreements regarding working hours and pay. Business Partners shall ensure that all employees are provided with understandable, written employment contracts setting out their employment conditions. Salary and terms shall be fair and reasonable, and at least comply with national laws or industry standards, whichever is higher. Working hours, holidays and leave of absence shall comply with national laws. Business Partners shall avoid any form of undeclared work.

### **Child labor and young workers**

NG Group's Business Partners shall not, in any circumstances, employ children who are below the minimum legal employment age. The minimum age is the age of completion of compulsory schooling, or not less than 15 years. Children and young people above the minimum age but under 18 years of age shall not be employed in any hazardous work, or work that jeopardizes their health, safety, or morals.

### **Non-discrimination**

NG Group's Business Partners shall treat their employees and contract staff with respect and dignity. Any discrimination, persecution and/or bullying based on partiality or prejudice is prohibited. This includes discrimination based on ethnicity, gender identity, gender expression, disability, sexual orientation, marital status, pregnancy, parental status, belief, religion, political beliefs, membership of a trade union, types of employees and/or age etc. Threats of violence, corporal punishment, physical or verbal abuse, or other unlawful harassment are strictly prohibited.

### **Health, safety, and environmental working conditions (HSE)**

NG Group's Business Partners shall provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Business Partners shall continuously seek to achieve "best practice" in terms of HSE standards and recommendations, as well as learning from incidents. Business Partners shall ensure that

appropriate health and safety information is provided to (i) its employees, (ii) its contract staff and (iii) their business partners, and that relevant training and protective equipment is provided. Business Partners working for NG Group shall comply with NG Group's general HSE requirements as applicable.

### **Prevention of alcohol and drug use at work**

NG Group is an alcohol- and drug-free workplace. NG Group's Business Partner's employees and contract staff are permitted to work at NG Group's premises only if they are sober and drug-free, and occasional testing can be performed if it is allowed in national (or local) legislation. NG Group's Business Partners shall take precautionary action to prevent alcohol and drug abuse.

## **ENVIRONMENT**

### **Environmental expectations**

NG Group's Business Partners shall support a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility. Business Partners shall at least comply with all applicable environmental laws and regulations. Business Partners should identify the footprint and environmental impacts of their operations and implement mitigating actions when required. Business Partners are expected to strive to continuously reduce their resource use, e.g. energy and water, as well as minimize waste and emissions to the air, water, and land from their operations, and mitigate impacts on biodiversity. Business Partners should consider the impact on climate of their operations and reduce greenhouse gas emissions where feasible. Business Partners are encouraged to develop and diffuse environmentally friendly technologies.

### **Promoting the circular economy**

Business Partners are expected to promote the circular economy and pay attention to the efficient use of materials and the lifecycle impact of their products.