

NORTAL SUPPLIER CODE OF CONDUCT

NORTAL GROUP

PREPARED FOR:

Nortal Group

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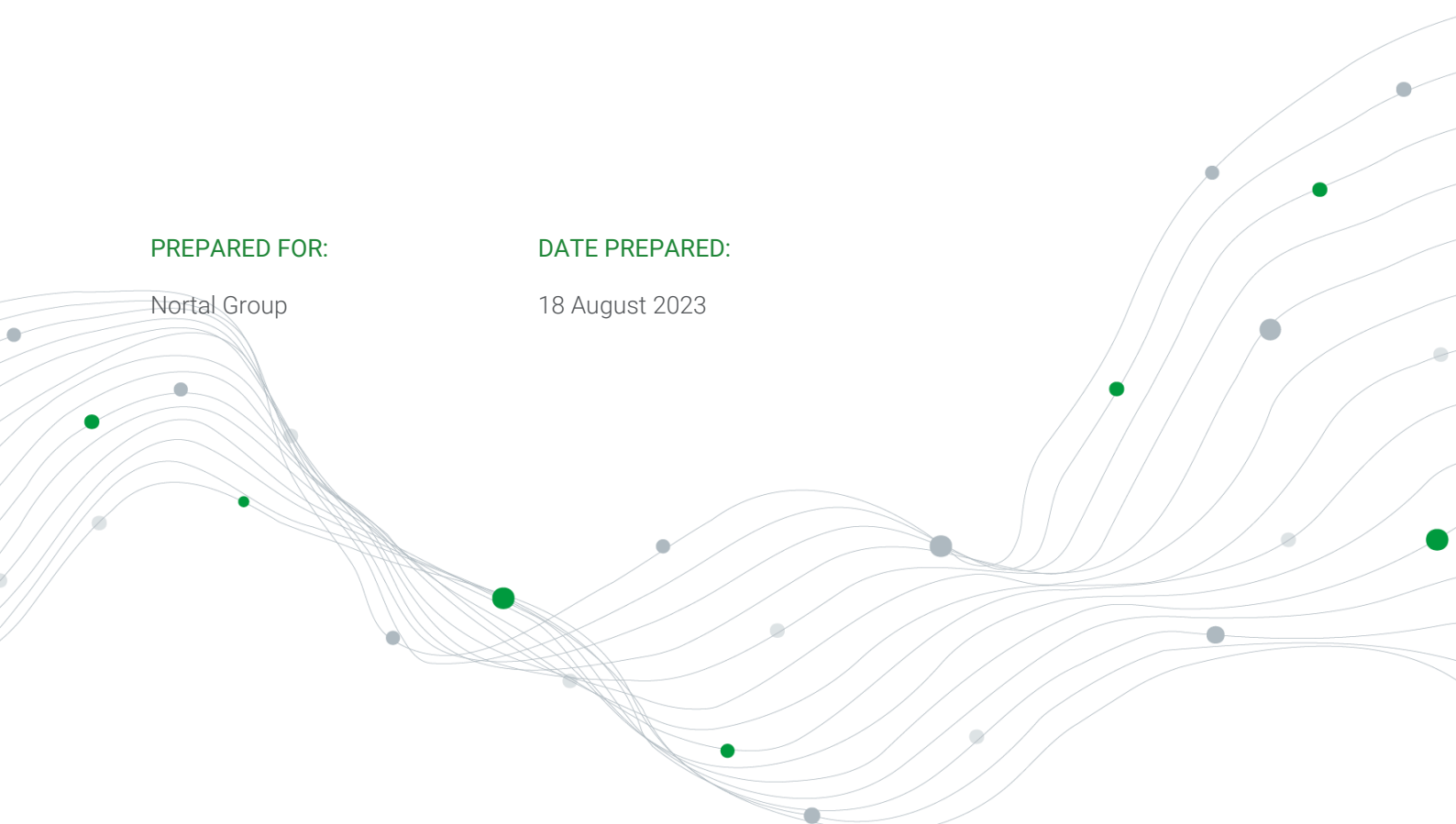


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1. Introduction

Welcome to Nortal's Code of Conduct. This document serves as a guide for our valued suppliers, outlining the ethical, legal, and operational standards we expect all our partners to uphold in their dealings with us, their employees, and the wider community.

Objective of the Conduct Guidelines

The objective of these guidelines is to ensure that all our suppliers understand and align with our commitment to ethical business practices, respect for individuals, environmental responsibility, and delivering value to our clients. These standards are not just a list of rules; they reflect our core values and the way we choose to do business.

Dedication to Ethical Practices and Sustainable Operations

At Nortal, we are committed to conducting our business in an ethical, legal, and socially responsible manner. We believe that our suppliers play a crucial role in our mission to create a positive impact on society and the environment. Therefore, we expect our suppliers to share our commitment and adhere to these standards.

Expectations from Supply Chain Partners

We understand that our suppliers are independent entities, but the business practices and actions of a supplier may significantly impact and reflect upon us, our reputation, and our brand. Hence, we expect all our suppliers to conduct their business in a manner consistent with our standards.

We are committed to working collaboratively with our suppliers to ensure these standards are understood and met. We believe that together, we can create a more sustainable, fair, and inclusive supply chain that benefits us all.

Thank you for your partnership and your commitment to these principles. We look forward to working together to uphold these standards and create lasting value for our clients, our people, and our communities.

2. Environmental Responsibility

At Nortal, we recognize the importance of protecting our planet and promoting sustainable practices. We believe that our suppliers play a vital role in achieving these goals.

Adherence to All Relevant Environmental Regulations

We expect our suppliers to comply with all local, national, and international environmental laws and regulations applicable to their operations. This includes, but is not limited to, regulations related to waste disposal, emissions, and resource consumption.

Initiatives to Minimize Environmental Footprint

Beyond compliance, we encourage our suppliers to proactively seek ways to reduce their environmental footprint. This could include implementing energy-efficient practices, reducing waste, using sustainable materials, and promoting recycling. We value suppliers who are innovative and proactive in their approach to environmental stewardship.

3. Workforce Excellence

Nortal is committed to fostering a diverse, inclusive, and respectful work environment. We expect our suppliers to share this commitment in their own operations.

Upholding Equal Opportunity in Recruitment and Employment

We expect our suppliers to uphold the principles of equal opportunity in all aspects of employment. This includes recruitment, hiring, training, promotion, compensation, and termination. Discrimination based on race, color, religion, gender, age, national origin, disability, veteran status, or any other protected status is not acceptable.

4. Delivering Client Value

Nortal is committed to delivering exceptional value to our clients. We expect our suppliers to contribute to this commitment by providing high-quality products and services.

Upholding Quality and Honoring the Terms of Nortal Contracts

We expect our suppliers to deliver products and services that meet our quality standards and comply with the terms and conditions of our contracts. This includes meeting delivery deadlines, adhering to specifications, and fulfilling any after-sales service obligations.

Ensuring Accuracy in Proposals and Invoices Submitted to Nortal

Accuracy in financial dealings is crucial. We expect our suppliers to submit accurate proposals and invoices to Nortal. Any errors should be promptly corrected, and any changes to the scope of work or costs should be communicated and agreed upon in advance.

5. Global Collaboration

Nortal operates in a global market, and we expect our suppliers to comply with all relevant laws and regulations.

Observance of Applicable Competition Laws

We expect our suppliers to comply with all applicable competition laws. This includes avoiding anti-competitive practices such as price fixing, market sharing, or abuse of market power.

Adherence to Anti-Money Laundering Laws

We expect our suppliers to comply with all applicable anti-money laundering laws. This includes conducting appropriate due diligence on customers, reporting suspicious transactions, and maintaining adequate records.

Antitrust and Competition Laws

Nortal is committed to be always compliant with antitrust or competition laws when it comes to our operations. As a supplier to Nortal you should avoid anti-competitive practices such as price-fixing, limiting production quantities, restricting trade and any other practices that risk the distortion or manipulation of fair competition like boycott suppliers or customers and avoid sharing information about prices, costs, profits or profit margins, production volumes or bids, or quotes for a specific customer's business and avoid practices that gain or seek to gain an advantage over your rivals through misleading, deceptive, dishonest, fraudulent, coercive or unconscionable conduct in trade or commerce.

6. Respecting Individuals

At Nortal, we believe in treating all individuals with respect and dignity. We expect our suppliers to uphold the same values in their operations.

Ensuring Respectful and Dignified Treatment of All Individuals

We expect our suppliers to treat all individuals with respect and dignity. This includes employees, customers, business partners, and members of the community. Any form of harassment, discrimination, or abuse is unacceptable.

Respecting Employees' Rights to Association and Collective Bargaining

We respect the right of employees to freely associate and bargain collectively, in accordance with local laws and regulations. We expect our suppliers to uphold these rights in their operations.

Prohibition of Forced Labor, Human Trafficking, and Child Labor

We have zero tolerance for forced labor, human trafficking, and child labor. We expect our suppliers to ensure that these practices do not occur in their operations or supply chains.

Compliance with Labor Laws

Our suppliers must comply with all applicable employment laws, including those related to wages, working hours, and benefits. We also expect our suppliers to provide a safe and healthy work environment for their employees.

7. Upholding Integrity

Integrity is a core value at Nortal. We expect our suppliers to conduct their business with integrity and to comply with all applicable laws and regulations.

Prohibition of Offering Inappropriate Gifts or Entertainment to Nortal Employees or Third Parties

We expect our suppliers to avoid any form of bribery or corruption. This includes offering inappropriate gifts or entertainment to Nortal employees or third parties.

Compliance with Anti-Corruption Laws

Our suppliers must comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and U.K. Bribery Act 2010. Any form of bribery, corruption, or improper influence is unacceptable.

Protection of Personal Data Privacy

We expect our suppliers to respect and protect the privacy of personal data. This includes complying with all applicable data protection laws and regulations.

8. Compliance Management

Nortal is committed to ensuring that all our suppliers understand and adhere to our Supplier Code of Conduct. We have established a compliance management process to support this.

1.1 Acceptance of Nortal's Conduct Guidelines

We require all our suppliers to formally accept and commit to our Supplier Code of Conduct. This acceptance should be documented and can be requested by Nortal at any time.

Participation in Supply Surveys and Assessments

As part of our compliance management process, we may ask our suppliers to participate in surveys and assessments. These are designed to evaluate the supplier's compliance with our standards and identify areas for improvement.

Procedure for Discontinuing Business

If a supplier fails to comply with our standards, we have a procedure in place for discontinuing business with that supplier. This procedure ensures that the decision is made fairly and transparently, and that the supplier is given an opportunity to address the issues identified.

9. Non-compliance with Nortal's Supplier Code of Conduct

Non-compliance with our standards is a serious matter and can have significant consequences.

Consequences of Non-compliance

Consequences of non-compliance may include termination of the supplier contract, legal action, and reporting to relevant authorities. The specific consequences will depend on the nature and severity of the non-compliance.

Reporting of Non-compliance

We encourage all our suppliers, employees, and other stakeholders to report any suspected non-compliance with our standards. We have established a confidential reporting mechanism for this purpose.

Revision history

VERSION	DATE	REVISION AUTHOR	SUMMARY OF CHANGES
1.1	18.08.2023	Maria Tymtsias, Kadri Riisalu	Global Supplier Code of Conduct created for Nortal Group