

Supplier Code of Conduct for Suppliers

I. Introduction

This Supplier Code of Conduct covers Nordic Grid Solutions and companies owned by Nordic Grid Solutions at present Stitec AB, Sweden, and Triarca A/S, Denmark.

Nordic Grid Solutions has a strong commitment to economic, environmental, and socially sustainable development.

We select suppliers who share our commitment to social responsibility and sustainable business practices. This includes demonstrating responsibility towards the people taking part in the manufacture and delivery of products and services.

To make its position clear to all Suppliers, Nordic Grid Solutions has established the Supplier Code of Conduct (the “**Code**”). The Code sets out minimum requirements for our direct suppliers and selected sub-suppliers (hereinafter referred to as “**Supplier(s)**”) as decided by us to operate in accordance with responsible business principles as detailed in this Code and in full compliance with applicable laws and regulations. Nordic Grid Solutions is defined as AE2017 Bidco ApS and its subsidiaries including, but not limited to, Stitec AB, Triarca A/S and Triarca GmbH.

The purpose of this Code is for our suppliers to make a resilient responsible supply chain, so the Nordic Grid Solutions products/services are manufactured in a responsible way. We continuously progress in our responsible business conduct across our supply chain. This Code is based on our values, that links to Human Rights, but also the belief that we can make a difference environmentally, simply by thinking flexibility and simplicity into delivering packages.

This Code sets the standards for how we expect our suppliers to behave with regards to their social, ethical and environmental business practices. It sets out general principles, rather than a complete set of detailed rules and the Code shall be updated by us from time to time.

This Code is based on the following internationally recognized standards:

- United Nations Convention against Corruption
- ISO 45001 Occupational Health & Safety Management System Standard

- ISO 14000 Family – Environment Management. Furthermore the supplier undertakes to comply with applicable environmental legislations RoHS and REACH EU directives.
- Responsible Minerals Initiative (RMI)
- The Universal Declaration of Human Rights
- International Labor Standards issued by the International Labor Organization
- The International Program on the Elimination of Child Labor

II. Implementation

Our Suppliers are required to implement the principles and standards of this Code to their own business partners, including suppliers, contractors etc. The Supplier agrees that it shall not act or omit to act in ways which would otherwise bring the Supplier or Nordic Grid Solutions in conflict with the stated principles.

The Code applies to the Supplier and all its affiliates. Supplier shall inform its affiliates on their obligations in relation to the Code and the Supplier is responsible towards Nordic Grid Solutions for its affiliates' compliance with the Code.

Supplier shall take all necessary actions to ensure Supplier's compliance with this Code, without undue delay. In addition to complying with the Code, Supplier shall comply with applicable local laws.

If Supplier uses sub-suppliers for its supplies to Nordic Grid Solutions and/or acts as a distributor or wholesaler towards Nordic Grid Solutions, the Supplier shall use its best endeavors to ensure that its sub-suppliers comply with the Code.

As stipulated in the product supply agreement, Nordic Grid Solutions may conduct announced audits at the Supplier's sites, including the Supplier's manufacturing facilities to verify that the Supplier is in compliance with the Code ("**CoC Audit**"). CoC audits may be performed either by Nordic Grid Solutions employees or by a third-party auditor chosen by Nordic Grid Solutions.

To verify the Supplier's compliance with the Code, Supplier shall be prepared to provide Nordic Grid Solutions access to relevant and reasonably requested information and documentation, during an audit.

All information and results obtained in connection with the CoC audits will be handled confidentially by Nordic Grid Solutions and will only be shared with Supplier.

This Code deals with the following standards, namely:

- Business Ethics
- Health & Safety
- Environment and Climate
- Working Conditions and Employment Practices
- Whistleblower Arrangement

III. Business Ethics

We require our Suppliers to conduct their business by adopting the highest standards of ethical behavior.

To achieve the requisite standard, Supplier

- A. has Implemented a written policy with respect to corruption/bribery/extortion in adherence to the anti-corruption/anti-bribery laws governing the country in which they operate and promotes employee awareness of the same.
- B. adheres to principles of fair competition in line with the anti-trust and competition laws governing the country in which they operate.
- C. has procured and operates with a valid registration/license as prescribed by the laws governing the country in which they operate.
- D. has taken adequate measures to protect all documents, records, correspondence, information and transaction of any form, concerning the operation or business of Nordic Grid Solutions, obtained in the course of the business activities including adherence to the requirements on confidentiality and data protection and cyber security.
- E. agrees to disclose any potential or actual conflict of interest to Nordic Grid Solutions.

IV. Health & Safety

We require our Suppliers to provide a safe, secure and healthy environment for all of their Workforce.

To achieve the requisite standard, Supplier

- A. has established a health and safety policy in accordance with industry standards and in a language communicable to all the Workers.
- B. Ensures that its Workforce is provided with Personal Protective Equipment and training, necessary to safely perform functions in their position.
- C. Ensures compliance with applicable laws and regulations including fire protection.

- D. Establishes a business continuity plan that includes risk assessments of threats.
- E. Empowers Workers to report unsafe practices and strives towards establishing best practices.
- F. Must ensure that salaries for work hours and overtime are paid in accordance with the applicable national law / rules.

V. Environment and Climate

We require our Suppliers to integrate environmental considerations into their business operations.

To achieve the requisite standard, Supplier

- A. Confirms that it is in compliance with the applicable national, international environmental laws and standards and has obtained all the necessary environmental permits, approvals and registrations.
- B. Shall promote environmentally friendly technologies and processes in their own operations.
- C. Is expected to establish a process for and continue to work towards improving their process for
 - a) Hazardous substance and waste management
 - b) Wastewater and Solid waste
 - c) Air emissions
 - d) Noise management
 - e) Pollution prevention.

VI. Working Conditions and Employment Practices

We require our Suppliers to adopt a sustainable working environment where Workers are treated with dignity and respect. Where local laws dictate any additional requirement, those will be applicable along with the ones mentioned below.

A. Respectful Treatment and Equal Opportunity

To achieve the requisite standard, Supplier

- a) Should not engage in or support discrimination of any form based on factors including but not limited to sex, race, color, disability, language, belief, religion, nationality, marital status, sexual orientation or political affiliation.
- b) Has established a written policy with respect to the employment-related decisions

- including recruitment and termination are based on relevant and object criteria.
- c) Protects its Employees from harassment, abuse or threats in the workplace and has a procedure for receiving complaints of workplace violence, harassment, threats or other types of workplace misconduct.

B. Child Labour

The Supplier should not employ Workers under the applicable legal minimum age.

To achieve the requisite standard, Supplier

- a) Has established a clear policy regarding minimum age of employment in compliance with applicable laws and regulations.
- b) Has a written policy on the health, morals or safety of Employees under the age of 18.
- c) Should not use or benefit from any kind of forced or involuntary labor and has a written contract with each Employee which also includes provisions explaining all the applicable legally mandated benefits that they're entitled to and in a language they understand.

C. Working Hours and Compensation

The Supplier shall comply with appropriate working hour requirements.

To achieve the requisite standard, Supplier

- a) Ensures by policy and practice that the maximum working hours in a week including overtime is as per the applicable laws and regulations.
- b) Overtime hours must be reasonable and must be appropriately compensated.
- c) Shall adhere to relevant national laws with respect to paid sick leave, paid annual leave and paid parental leave.

D. Employee Privacy

The Supplier shall ensure that the collection and processing of Employee's personal data is in line with the relevant data privacy regulations and best practices.

To achieve the requisite standard, Supplier

- a) Shall observe and comply with the General Data Privacy Regulation (if situated within Europe) or with applicable data privacy principles and requirements and/or legislations as enacted in the country in which they operate with respect to data subject's rights.
- b) Should not collect sensitive personal data and special categories of personal data without securing the legal basis and having notified the data subjects of the same.

VII. Whistleblower Arrangement

Nordic Grid Solutions A/S is committed to the highest possible standards of openness, honesty and accountability. The purpose of this policy is to provide Nordic Grid Solutions's internal and external stakeholders with a framework for reporting suspected misconduct within the company without fear of retaliation.

Please see possibilities for reporting and submitting misdemeanors on Nordic Grid Solutions's Website

VIII. GLOSSARY

Affiliates shall refer to the Parent Company or relevant Group Companies of the Supplier that are bound by this Code in line to their business relationship with Nordic Grid Solutions.

CoC Audit shall refer to the audit conducted by the employees or the third party auditors as appointed by Nordic Grid Solutions.

Code shall refer to this Code of Conduct.

Employee/Worker shall refer to an individual, who works part-time or full-time under an open or fixed term of contract of employment.

Supplier shall refer to an entity or an organization providing goods or services under a contract or otherwise.

Workforce shall also refer to the total number of Employees employed by the Supplier.

I, on behalf of _____, acknowledge that I have read and understand the Nordic Grid Solutions Code of Conduct for Suppliers and agree to comply with the requirements of the Code (fill in using block letters or company stamp):

Supplier's name: _____

Address: _____

Signature of the Authorized Signatory:

Date:

Name:

Block letters