

## NSG Group Supplier Code of Conduct

### Introduction

NSG Group aims to enjoy the highest reputation worldwide for the professional, legal and ethical way in which we conduct our business as communicated in our statement of NSG Group Values and Principles.

The standards that we expect from our employees are documented in the NSG Group Code of Conduct. The behaviours, processes and procedures that we expect from our suppliers are documented in this Supplier Code of Conduct.

Wherever possible, this Code defines a fair and common sense approach to doing business, while incorporating all relevant legal requirements.

To provide materials or services to NSG Group all suppliers are required to comply with this Code of Conduct in addition to all applicable laws and regulations. All suppliers are also expected to respond to reasonable requests for information from NSG Group necessary to demonstrate compliance with this Code.

### Good Governance

Ethical behaviour is an integral part of everything that we do. The application of strict standards to avoid bribery and corruption-related risks and compliance with our high ethical standards are essential to our continued success. As an international business our policy is to follow our own internal procedures and guidelines while also respecting local legislation wherever we operate around the world

In everyday business transactions our suppliers must be even-handed and fair without deception or dishonesty in their dealings with customers, suppliers and others with whom they work.

We expect all our suppliers to:-

- Accept personal responsibility for behaving professionally, ethically, fairly and with integrity.
- Prohibit any actions that falsify or distort free competition or market access or infringe the applicable legal rules concerning competition law
- Prevent the offering, promising or giving of a bribe and the requesting, agreeing to receive or accepting of a bribe by any person associated with them
- Notify NSG Group immediately if they become aware that any of the supplier's directors, officers or employees act in the capacity of a Public Official where this could be relevant to their relationship with NSG Group
- Notify NSG Group immediately if they become aware that any of the supplier's directors, officers or employees have a relationship with any NSG Group employee that could result in a conflict of interest

- Comply with the fiscal obligations within all territories in which they operate.
- Operate and maintain an Employee Code of Conduct

### **Social Responsibility**

As a major international business we have significant relationships across the world with our employees, the communities in which we operate and the many stakeholders in our businesses. As a consequence we take our corporate social responsibilities seriously and acknowledge internationally proclaimed human rights.

All suppliers must conform to the relevant International Labour Organisation Labour Standards as a minimum requirement.

This means suppliers must strive to apply employment standards which promote the application of human rights. There should be no intentional discrimination for recruitments, promotions, job transfer, dismissal and other employment related activities on the basis of race, colour, creed, nationality, age, marriage or civil partnership, pregnancy and maternity, gender, gender reassignment, sexual orientation, religion or belief, ethnic or national origins, disability, union membership, political affiliation or other status protected by law.

Local laws on age discrimination must be observed. Abuse, harassment or intimidation will not be tolerated under any circumstances nor will the act of pressurising or retaliating against the individual who reports such harassment.

NSG Group is committed to sourcing components and materials from companies that share our values around human rights, ethics and environmental responsibility. In this light, NSG Group is committed to sourcing minerals in a manner that respects human rights.

NSG Group is committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business.

We expect all our suppliers to:-

- Provide a safe and healthy working environment by minimising, as far as is reasonably practical, the causes of hazards inherent in the working environment.
- Minimise the risk of exposure to harmful materials, machinery or operations.
- Operate and maintain an effective safety policy.
- Respect national employment law on working hours. NSG Group will not engage with suppliers who apply or support forced labour. Young people under the age of 15, or older if defined by law, must not be employed.
- Carry out due diligence with respect to the sourcing of conflict minerals and to support our customers in complying with the conflict minerals reporting obligations
- Comply with legislation regarding slavery and human trafficking.
- Comply with local NSG Health and Safety policies, including those related to alcohol and drug misuse, when working at or visiting NSG premises.

## **Environmental Responsibility**

NSG Group is fully committed to environmental sustainability. Our policies underline the unique contribution our products can make to addressing climate change and the challenges we face in improving our own energy usage and resource management. In line with our Sustainability Policy, NSG Group will communicate and work constructively with our suppliers and governments, regulatory agencies, the scientific community and other relevant stakeholders as appropriate, to develop and encourage business and community practices that make progress towards the common aim of sustainable development

Our suppliers must therefore also recognise the crucial importance of their role in reducing environmental impact.

We expect our suppliers to play their part in creating a prosperous and sustainable future by continually seeking to achieve best practice in environmental protection.

We expect all our suppliers to:-

- Comply with all applicable environmental legislation.
- Have an environmental policy that is proportionate to the environmental risk of their business.
- Manage hazardous material through compliance with applicable laws, regulations and standards as well as internal rules and procedures. Suppliers must seek to take every possible measure in order to prevent release of hazardous material, fire, explosion and other major accidents that may cause severe damage to their own employees, premises, surrounding communities and environment.
- Follow procedures that ensure existing plant and equipment are operated in ways which minimise any impact on the environment.
- Train employees and provide the necessary resources to make them aware of their personal environmental responsibilities in protecting the environment.

Our suppliers must uphold the same standards with regards to their own suppliers, contractors and sub-contractors and be able to provide evidence of this if requested.

## **Risk Management**

The scope of our operations introduces potential risks to our business activities, requiring effective risk management. We manage risk responsibly to meet our commitments to both our employees and our shareholders.

We expect our suppliers to demonstrate a responsible attitude towards risk and for them, in turn, to expect the same from their own suppliers.

We expect all our suppliers to:-

- Operate their business in a responsible and prudent manner to minimise the risk of financial failure

- Inform NSG Group of any issues or developments that significantly increase the level of risk in the supply chain to NSG Group
- Maintain their own supplier risk assessment process

### Supplier Development

NSG Group will measure its suppliers against its expectations; both during and after the selection process using a series of Key Performance Indicators (KPI's) which will be used as a tool to drive continuous improvement.

We will expect our suppliers not only to operate in compliance with today's expectations but also be aware of and already preparing for tomorrow's anticipated demands for example from NSG Group, its customers or government driven legislation aimed at continually improving peoples' wellbeing and the environment in which they live.

NSG Group will work with its suppliers, to develop these initiatives or improve existing solutions which will also cover the areas of technical innovation & operational improvement.



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**Acceptance**

If you are signing on behalf of more than one legal or trading entity please state below all legal or trading entities to which this signature applies.

**On behalf of the company indicated below, I confirm its agreement to comply with the attached NSG Group Supplier Code of Conduct**

Supplier Information	
Supplier Name	
Supplier Address	
Personal Information	
First Name	
Last Name	
Job Title	
Email Address	
Date Accepted	
Signature and / or official company stamp	