

Introduction

NSG Group aims to enjoy the highest reputation worldwide for the professional, legal and ethical way in which we conduct our business, and has accordingly established its **Environmental Social Governance (ESG)** goals as part of its Sustainability strategy.

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

This Code outlines a fair and common-sense approach to doing business, while incorporating all relevant legal requirements.

All suppliers are required to comply with this Code of Conduct in addition to all applicable laws and regulations. NSG Group's suppliers must uphold the same standards with their own suppliers, contractors and sub-contractors. All suppliers are expected to respond to reasonable requests for information from NSG Group necessary to demonstrate compliance with this Code.

E – Environment

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 with 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.

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 and minimising any detrimental effects from their operations on the environment as far as is reasonably practicable.

We expect our suppliers to:-

- Comply with all applicable environmental legislation.
- Have an environmental policy that is proportionate to the environmental risk of their business.
- Manage chemicals and hazardous materials 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 the release of hazardous material and the occurrence of 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.

- Make practical efforts to minimise the use of energy and materials.
- Make practical efforts to maximize the efficient use of water and ensure that wastewater is controlled within acceptable quality limits.
- Make practical efforts to minimise the generation of waste, including making efforts to reuse and recycle waste where possible.
- Take measures to support NSG Group's Scope 3 greenhouse gas emissions objectives, including the adoption of renewable energy, where possible, and provide NSG Group with information, as requested.
- Take action to manage pollutant air emissions within acceptable levels.
- Train employees and provide the necessary resources to make them aware of their personal responsibilities in protecting the environment.

S- Social

As a major international business, we have significant relationships across the world with our employees, the communities in which we operate and our many other stakeholders. 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.

Inclusion and diversity is a priority for NSG Group. We believe in having an inclusive culture and environment and a diverse workforce.

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 responsibly sourcing minerals in a manner that does not directly or indirectly finance or benefit armed groups or cause human rights abuses.

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 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 health and safety policy, including ensuring employees and visitors are sufficiently protected in the event of an infectious disease outbreak.
- Comply with local NSG Group Health and Safety policies when working at or visiting NSG Group premises.
- Promote inclusivity and diversity within their business and supply chain
- Ensure that products supplied to NSG Group do not contain metals derived from minerals or their derivatives that finance or benefit armed groups or cause human rights abuses.
- Carry out due diligence with respect to the sourcing of conflict minerals and other minerals from high-risk areas and support NSG Group and our customers in complying with conflict minerals reporting obligations.
- Comply with legislation regarding slavery and human trafficking.
- 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.
- Undertake appropriate due diligence and ongoing management where recruitment agencies or brokers are used, in order to mitigate the risks of worker exploitation such as debt bondage and unsafe housing.
- Ensure that at a minimum, the legal minimum wage standard is adhered to across the workforce (including employees employed through recruitment agencies or brokers) and that unfair deductions are not made.

G – 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 our suppliers to:-

- Accept personal responsibility for behaving professionally, ethically, fairly and with integrity.
- Operate and maintain an employee code of conduct.
- 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, including paying taxes whenever and wherever due. Suppliers must not knowingly engage in or assist others in any activity, practice or conduct which could constitute tax evasion.
- Respect and protect intellectual property rights.
- Implement and maintain robust cyber security processes within their systems.
- Ensure that all uses and storage of personal data are in compliance with applicable laws and regulations, such as the General Data Protection Regulation (GDPR).
- Operate their business in a responsible and prudent manner to minimise the risk of financial failure and inform NSG Group of any issues or developments that significantly increase the risk of financial failure in the supply chain to NSG Group.
- Ensure resilience and be prepared for disruptions to its business as a result of emergencies, such as natural disasters, terrorism, civil unrest and pandemics. This should include implementing the appropriate contingency plans and regularly reviewing exposure in the supply chain.
- Ensure that sufficient levels of insurance are maintained.

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 our employees, shareholders and other stakeholders.

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:-

- Develop and implement procedures to regularly assess and evaluate all risks in their operations and supply chains.
- Implement and execute action plans, where risk is identified.
- Inform NSG Group of any issues or developments that significantly increase the level of risk in the supply chain to NSG Group.

Supplier Evaluation & Development

Using the "EcoVadis" sustainability scorecard platform and other Key Performance Indicators (KPIs), NSG Group will monitor and evaluate its suppliers against the expectations outlined in this Code; both during and after the selection process. Where weaknesses or failures are

identified, we will work with suppliers to improve performance and strive towards the highest standards.

We expect our suppliers not only to operate in compliance with today’s expectations but also be aware of and be preparing for future ESG requirements from NSG Group and future legislation.



Document Reference	NSGCOC
Issued Date	26 th January 2021

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	