



NCC Supplier Code of Conduct

Introduction

This NCC Supplier Code of Conduct provides our suppliers with guidelines for their actions and decisions. It is based on NCC's values and on voluntary initiatives we have adopted, such as the World Economic Forum's Partnering Against Corruption Initiative (PACI) and the UN Global Compact. These initiatives set out principles for addressing human rights, work methods, the environment, and corruption.

NCC encourages all suppliers to establish their own codes of conduct or similar guidelines, provided that the content in this Supplier Code of Conduct is, as a minimum, always followed. NCC suppliers must flow down the content of this code to all persons and entities supplying goods or services within their own value chain.

Who the Supplier Code of Conduct applies to

This Supplier Code of Conduct applies to any entity providing products, people, or services to NCC, including its direct and indirect suppliers, service providers, subcontractors, intermediaries, and agents, and where applicable, the employees of the supplier and its subcontractors and agents. The supplier's issuance of invoices or the supplier's supply of goods, people, or services or the supplier's acceptance of NCC's purchase orders represents a continuing affirmation of compliance of the content of this Supplier Code of Conduct.

Note: "NCC" refers to NCC AB and its controlled affiliates and business organisations.

Suppliers must act and demonstrate that the practices and principles outlined in NCC's Supplier Code of Conduct are used within their operations.

Our values

NCC is a company guided by its values. Since our business partners are an important part of our operations, we also expect them to respect and stand by our values.

Honesty

- We are true to ourselves and our stakeholders
- We conduct business in a correct and responsible manner
- We make sure our stakeholders can always rely on NCC

Respect

- We value diversity and treat others respectfully
- We cooperate, value the opinion of others and we stand behind our decisions
- We use all our resources with care

Trust

- We trust each other, say what we mean and do what we say
- We have the courage to be forth right and clear
- We honor our commitments and strive for high standards of quality, ethics and sustainability

Producing unit Group Purchasing
Approved by CEO
Effective from August 2022

This NCC Supplier Code of Conduct is a complement to the full NCC Code of Conduct, where you can find further details. **Read more at www.ncc.group/codeofconduct**



Business ethics

At NCC, we strive to achieve long-term business relationships as a basis for generating customer value, shareholder value and secure workplaces that promote development.

NCC suppliers must:

- Comply with laws, rules and regulations of the jurisdiction in which they operate or where they provide services to NCC.
- Ensure that all reports, records and invoices are complete and accurate.
- Prohibit corruptions and bribery, such as giving or offering anything of value to a government official or company representative, including NCC employees, to influence a decision.
- Avoid situations that may present a conflict of interest in work with NCC, such as exploiting relations with business partners and NCC for personal gain.
- Be engaged in legitimate business activities where money laundering or criminal payments do not occur.
- Respect fair competition and antitrust law and not enter into any agreement concerning price fixing or market sharing.
- Not use or disclose sensitive or confidential information about NCC.
- Never share personal data except with those employees or associates who have a legitimate business need for the information, in accordance with applicable privacy laws.

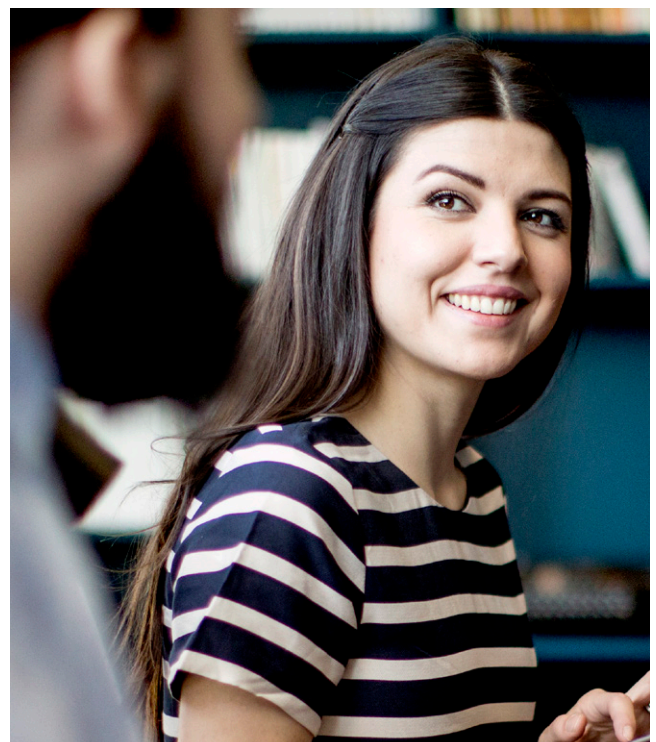


Human rights

At NCC, we support and respect international conventions concerning human rights, and promote diversity and equality.

NCC suppliers must:

- Promote equal opportunities, which applies to everyone irrespective of gender, transgender identity and expression, sexual orientation, ethnic background, religious beliefs, disability or age.
- Prohibit behavior or statements, or tell jokes, that may be understood or interpreted as degrading or humiliating to others.
- Contribute to a work environment that is free of hostile, violent, threatening or bullying behavior.
- Not engage in forced labor related activities, such as using force or threats to get a person to work, retaining their employees' identity documents and must ensure that employees are subject to fair working hours, wages and benefits that are consistent with laws and industry standards.
- Have zero tolerance for child labor.
- Respect the right of employees to organize themselves in voluntary employee organizations and to negotiate collectively.
- Encourage supply chain transparency and take reasonable efforts to avoid in its production the use of raw materials which directly or indirectly finance groups who violate human rights.





Occupational health and safety

At NCC, we have a vision of zero workplace accidents and work continuously to make improvements to ensure safe and healthy workplaces.

NCC suppliers must:

- Proactively manage health and safety risks to provide an incident-free production environment where occupational injuries and illnesses are prevented.
- As a minimum, follow the applicable employment laws and health and safety laws or international labor standards as defined by an internationally recognized body e.g. ILO, whichever standard is higher.
- Ensure that employees have relevant safety training for their work.
- Take responsibility and never disregard safety devices on worksites or the need for personal safety equipment.
- Report to NCC any health and safety incidents and unsafe conditions related to NCC's projects and work sites.



Environmental responsibility

At NCC, we prioritize suppliers that are proactive and systematic in their work relating to environmental sustainability. Our aim is to be able to produce sustainable products with low climate impact that are traceable throughout the supplier chain.

NCC suppliers must:

- Ensure that activities allow for efficient use of resources and reduction in all types of harmful substances, focusing on climate, energy, materials and waste.
- Show a proactive approach for continuous improvement of their environmental work including the development of their products or services they provide.
- Provide managers and NCC with ideas that could lead to innovations with a positive environmental impact.



Compliance and reporting

NCC's general approach is to encourage improvement. Critical deviations or repeated unwillingness to make improvement, however, may jeopardize the supplier's relationship with NCC.

NCC is entitled to perform audits of the supplier and be provided with the assistance needed from the supplier to establish the supplier's compliance with NCC's Code of Conduct and all applicable rules and regulations. NCC may engage a third party to perform such an audit on the condition that this third party does not conduct business in competition with the supplier within the field of the agreement.

NCC will act against business partners found to be in breach of our guidelines, and the relationship may be terminated, or other actions demanded, in the event of minor, repeated, or serious breaches.

Tell Me is a mechanism that enables NCC employees, suppliers, business partners and the general public to report possible breaches of the NCC Code of Conduct. All reports are investigated and treated in confidence. Read more at: www.ncc.group/report

NCC suppliers must:

- File a report in *NCC Tell Me* if an employee of NCC, NCC supplier, or anyone acting on behalf of NCC, violates national laws or breaches the NCC Code of Conduct.
- Ensure that investigation or retaliations do not jeopardize the employment of NCC employees or suppliers, because they have insisted on following the NCC Code of Conduct or filed a report in *NCC Tell Me*.
- Inform NCC if the relationship between NCC and the supplier or its sub-supplier could put NCC in risk of breaching UN, EU or US sanctions.

For questions or additional information related to the NCC Supplier Code of Conduct, please visit www.ncc.group/for-suppliers