

# NORLYS

## Supplier Code of Conduct

### Introduction

**Norlys is Denmark's largest integrated energy and telecommunications group. We deliver energy, charging stations, internet, television, mobile services, among other things to our clients. We are co-operatively owned by more than 800,000 Danes.**

Norlys is a signatory to the United Nations Global Compact. Furthermore, we are committed to the Science Based Targets initiative and to the United Nations Guiding Principles on Business and Human Rights.

Norlys has a strong focus on sustainability and expect our suppliers to support this.

### Scope

- This Supplier Code of Conduct (SCoC) applies to all Norlys suppliers and contractors.
- It is the responsibility of our suppliers, on a best effort basis, to ensure that their sub-suppliers and other third parties acting on their behalf do not violate the standards of this SCoC.
- Norlys reserves the right to audit our suppliers or request third-party verifications to ensure supplier adherence to this SCoC.
- Norlys expects suppliers to have a reporting system in place with an option to report anonymously, enabling employees to voice any concerns without fear of retaliation.
- We acknowledge that establishing these processes may require time and resources. Thus, it is our intention that the implementation of these processes can take place in a collaborative manner, where we can share knowledge and experiences.

### Environment and climate

**At Norlys we strive to create sustainable solutions for customers, partners, suppliers, and society. We wish to collaborate with suppliers who share these values.**

- Suppliers must have an environmental policy or statement corresponding to the size of their operation.
- Suppliers must establish processes that cover all significant impacts on the environment and comply with all applicable national and international laws and regulations related to the environment.
- Suppliers are expected to maintain awareness of environmental legislative requirements that are relevant to the environmental impact of their activities, products, and services.
- Emergency procedures to effectively prevent and mitigate emergencies and industrial accidents which can have an adverse impact on the environment must be established, followed, and maintained.
- We expect suppliers to continuously monitor their environmental impact to promote continuous improvement and to reduce environmental impacts in their supply chain.
- In line with the Science Based Targets initiative, Norlys aims to reduce the greenhouse gas emissions in our supply chain.

- To meet the goals of the Paris agreement, suppliers are encouraged to join the Science Based Targets initiative and reduce their greenhouse gas emissions.
- Norlys encourages suppliers to choose environmentally responsible materials, methods, and technologies and favour re-use and recycling (cf. waste hierarchy)
- Suppliers are expected to be willing and ready to disclose relevant environmental performance data, e.g. GHG emissions.

## **Human rights and labour standards**

### **Norlys is committed to upholding the fundamental rights of workers in its supply chain.**

- Norlys is committed to the protection of human rights and labour standards as defined by the International Labour Organization (ILO), the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. Suppliers are required to act in accordance with these commitments.
- Suppliers must treat all employees in compliance with applicable international, national, and local regulations.
- At Norlys, we have a zero-tolerance approach towards child labour, modern slavery, forced labour, and human trafficking. Suppliers are expected to adhere to all applicable anti-modern slavery, anti-human trafficking, and anti-child labour laws and regulations.
- Norlys expects suppliers to ensure a workplace free from discrimination, harassment, or bias based on race, sex, gender identity, sexual orientation, language, religion, political opinion, national or social origin, disability, age, health status or marital status. This commitment includes equal pay for equal work and the protection of employee data.
- Norlys expects suppliers to proactively engage with affected local communities in a respectful manner. It is the responsibility of all parties to engage with the communities and Norlys therefore expects suppliers to respect the rights and interests of local communities.
- Suppliers must recognize the right of workers to join, form or to not join trade unions of their choice without fear of intimidation, reprisal, or harassment.
- The employees' right to collective bargaining must be respected by suppliers. Furthermore, suppliers must comply with current laws concerning wages.
- Suppliers are always obligated to take fair labour conditions and child labour issues into account, when contracting with sub-suppliers and other third parties.
- Suppliers must ensure that working conditions are in accordance with industry standards, applicable laws, and regulations.

## **Health and safety**

### **A healthy and safe working environment for all employees is a key priority for Norlys.**

- We expect suppliers to comply with occupational health and safety regulations, as well as international standards and industry best practice.
- Suppliers must provide a healthy and safe workplace and suitable personal protective equipment, as well as adequate information on how and when this equipment should be used.
- To prevent injuries and ill-health, suppliers must identify hazards and risks associated with their operation and take the necessary precautions.
- Suppliers are required to have a system in place to monitor, develop and implement health and safety procedures related to business activities. Suppliers must investigate work-related accidents, keep records of incidents, state their cause, and take remedial measures to prevent similar accidents.
- Emergency preparedness measures must be taken, including providing suitable first aid arrangements and medical support facilities.

## **Business ethics**

### **Compliance with laws and regulations**

- Suppliers must comply with all applicable local and national laws, rules, regulations, and requirements of the country, in which they produce, manufacture, distribute, or provide products or services.

### **Fraud, corruption, and bribery**

- Norlys has zero tolerance towards all kinds of fraud, corruption, bribery, and extortion regardless of local laws and practices. Suppliers are expected to comply with Norlys' standards on fraud, bribery, and corruption and to establish adequate processes to counter fraud, corruption, bribery, or extortion.
- Hospitality, entertainment, and gifts must be transparent and reasonable. Suppliers are encouraged to implement a requirement to register and obtain approval before giving or accepting hospitality, entertainment, or gifts above a certain value.
- Suppliers must not try to gain undue advantages by promising, offering, giving, or accepting anything of value - directly or indirectly - to any public officials, business partners, or third parties. Suppliers must also not engage in any form of corruption, extortion, embezzlement, money laundering or fraud.
- Staff, whose job roles carry a higher level of risk in the ethical business practices, must be trained on what action to take in the event of an issue related to one or more of the former mentioned areas.

### **Conflict of interest**

- When signing a contract with Norlys, suppliers are expected to make sure that it has no conflict of interest, which potentially could prevent the supplier in acting in the best interest for Norlys or making impartial decisions.
- Norlys also expects suppliers to disclose any actual or potential conflict of interest and to immediately take measures to mitigate and report any such conflict.

### **Competition**

- Norlys expects suppliers to be respectful of free and fair competition and to comply with all applicable competition laws.

### **Complying with sanctions and trade embargos**

- Suppliers must comply with all applicable export control laws, as well as laws that prohibit or restrict business relationships with sanctioned countries, entities, people, or industry sectors.

### **Conflict minerals**

- Norlys expects suppliers to comply with the existing legal requirements concerning "conflict minerals", also referred to as 3TG (tin, tungsten, tantalum, and gold) in EU-regulations.

### **Protection of data and intellectual property**

- At Norlys we respect and handle personal data in accordance with applicable data protection laws and regulations. We expect suppliers to share this commitment and handle personal data in accordance with recognized security practices, legislations, regulations, and contractual obligations.
- Suppliers should always act truthfully in their management of any information and intellectual property related to Norlys.
- Suppliers shall never sell such information, never disclose it without Norlys' consent and ensure that information related to Norlys is only used for purposes of the provision of products and/or services to Norlys.
- Norlys expects to be notified in cases of violations of intellectual property rights, or if confidential or personal information related to Norlys, its employees, or business partners are disclosed.

## Compliance

**Norlys expects suppliers to comply with this SCoC and to adhere to all applicable laws, rules, and regulations, where they operate.**

- Norlys reserves the right to require suppliers to provide relevant documentation that relates to Norlys' operations. This includes providing documentation to any third-party entity that acts on behalf of Norlys.
- Suppliers should report any identified non-compliance with this SCoC to Norlys without unnecessary delay
- Norlys uses external screening tools to monitor supplier ESG performance. Norlys, or a third party appointed by Norlys, may request additional information, if needed.
- Suppliers must be prepared to rectify non-compliant behaviour, by establishing, in cooperation with Norlys where relevant, and following, a corrective action plan. A follow-up assessment must be completed to ensure that improvements are made within a reasonable timeframe.
- The provisions as set forth in this SCoC provide the minimum expectations to suppliers. These minimum expectations are based on: The general principles contained in the United Nations Global Compact, as made operational with the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights (IBHR), the International Labour Organization's Declaration on Fundamental Principles and Rights at Work (ILOD), the Rio Declaration on Environment and Development, the United Nations Convention against Corruption, and other relevant national and international principles.

### **Report your concerns to Norlys**

- Suppliers and their employees are strongly encouraged to use our whistleblower system in case they suspect misconduct. Any reports will be handled promptly, in a professional manner and treated with confidentiality.
- The Norlys whistleblower system can be accessed at [se \(\[whistleblownetwork.net\]\(https://whistleblownetwork.net\)\)](https://whistleblownetwork.net).