



Code of Conduct for suppliers

For future generations

NYAB enables the development of society for future generations and has extensive experience in complex and challenging projects.

nyabgroup.com

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Introduction

Background and purpose

NYAB is committed to sustainable, responsible and honest business. Acting rightly is always a choice, which is why it is essential that both NYAB's employees and its suppliers are aware and understand NYAB's ethical commitments to the company, to the customers and other business partners, to the stakeholders and to all the other people and environment around us.

The purpose of this Supplier Code of Conduct is that NYAB together with all its business partners are committed to similar set of ethical guidelines when it comes to participating in NYAB's projects or production chain and responsible business conduct and relationships.

The guidelines provided in this document are the key principles which applies to all NYAB's suppliers throughout the supply chain, regardless of the nature or duration of the supply. This document is based on the ten principles of the U N Global Compact, covering human rights, labour standards, environmental responsibility, and anti-corruption.

Where different language versions exist, this English version is the original and binding one.



NYAB's expectations of its suppliers

All suppliers of NYAB are obligated to commit and implement this Supplier Code of Conduct, and the documents it refers to, in their operations and supply chains, and to comply with the ethical guidelines stated in this document. NYAB complies with and expects its suppliers to comply with all applicable local and international laws and regulations. We also encourage all our suppliers to adopt their own code of conducts.

If a supplier does not meet the requirements set by NYAB, it will either be given the opportunity to take corrective action before it can be accepted as our supplier or will eventually be rejected during the tendering procedure. Should any misconduct under this document be

discovered during the course of the business relationship, it will be considered by NYAB as a breach of business relation and may result in termination of the business relationship.

NYAB expects its suppliers to report any misconduct, actions or conduct that are in breach of this document. It is essential to NYAB that its operating guidelines are adhered to and that any concerns or violations are brought to NYAB's attention. NYAB always encourages to contact it as soon as possible in case of suspect any misconduct. You may read more about how to report in section 5. Speaking Up of this document.

We are expected to:

- Both learn and follow the code of conduct
- Speak up and communicate our concerns if we suspect misconduct
- Ask our managers for advice when we are unsure of the right course of action

When in doubt, ask yourself:

- Is this in accordance with legislation and our guidelines?
- Are my actions correct and appropriate for the situation?
- Is this in the interests of NYAB and its staff, stakeholders and owners?
- Is the information I have received insider information?
- Am I sure that my actions will not reveal any insider information?
- How does this look from the perspective of my colleagues or outsiders?

People and culture

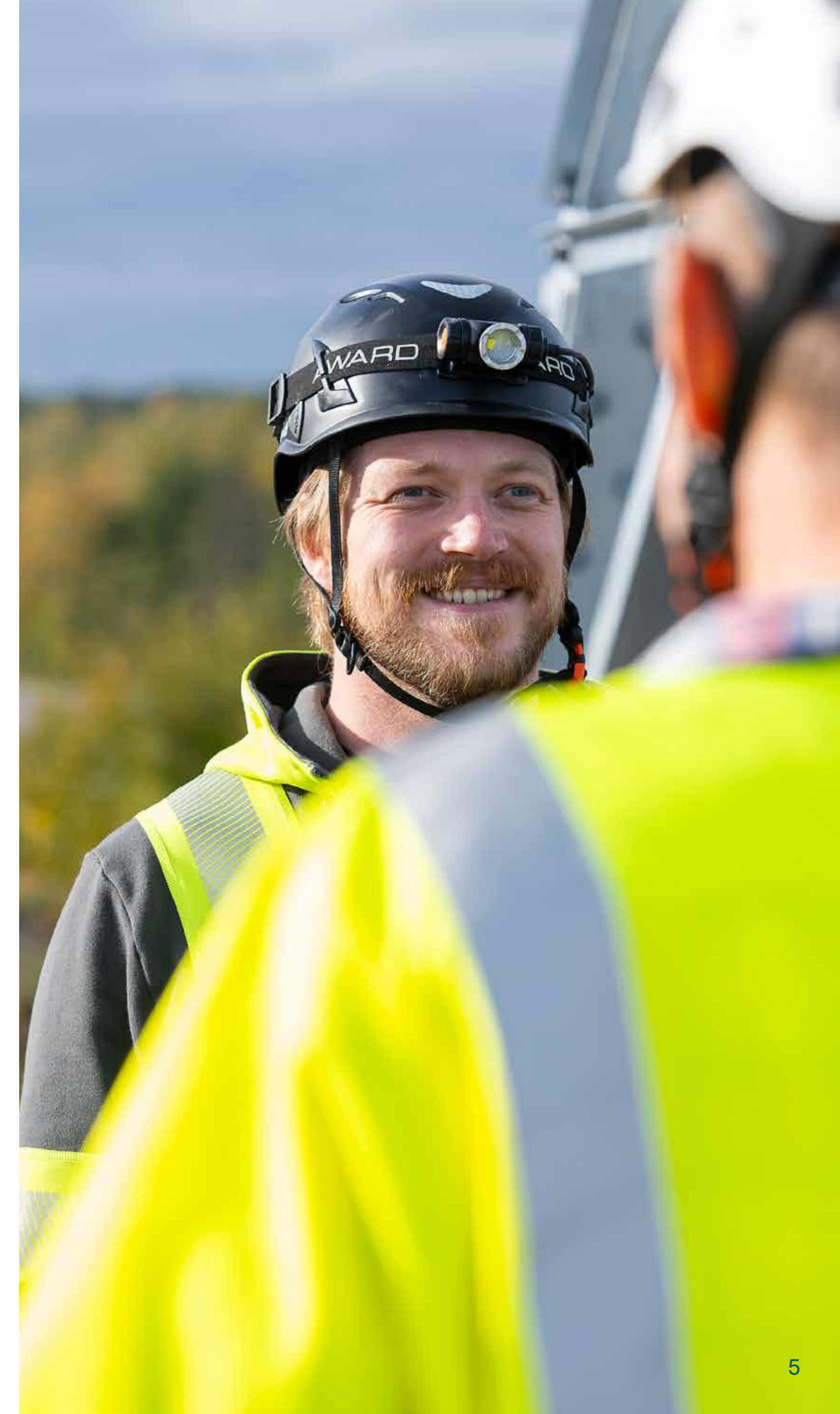
Healthy and safe workplace

Health and safety have always been one of the NYAB's top priorities. Treating all employees, customers, suppliers, stakeholders and all the other people around us fairly, equally and with dignity and respect is pivotal to NYAB.

NYAB promotes diversity and equality and strive to build an inclusive workplace for all. NYAB does not tolerate any discrimination,

harassment, bullying, or other inappropriate behaviour in any shape or form.

The safety of people is of paramount importance to NYAB, and good safety practices are always adhered. NYAB complies with all applicable occupational safety laws and guidelines, as well as other safety instructions if force.



Human rights, labour rights and child labour

NYAB is committed to respect internationally recognised human rights in all its operations and to promote their realisation. NYAB expects the same from its business partners.

NYAB supports the principles contained within the Universal Declaration of Human Rights, the EU Human Rights Convention and other core human rights conventions, the ILO Core Conventions on Labor Standards, the UN Guiding Principles on Business and Human Rights, the UK Modern Slavery Act 2015, the UK Human Rights Act 2000 and associated legislation.

NYAB expects its suppliers to respect these internationally recognised human and labour rights throughout their supply chain.

“ *We are committed to respecting and acting in accordance with international human rights in all our activities. And we expect our business partners to do the same.*

We are expected to:

- Immediately report any actions that may jeopardise human rights to managers or through designated channels
- Treat everyone fairly, regardless of personal characteristics or other factors
- Adapt behaviour to comply with equality, non-discrimination and personnel policies
- Encourage a culture of respect and dignity among colleagues and partners
- Report safety issues, participate in training and maintain a safe working environment

NYAB adheres to laws and commitments

Fair competition, anti-bribery and corruption

NYAB supports free and fair competition and adhere to competition legislation, the objective of which is to promote effective competition and protect the market from unfair business practices. NYAB maintains zero tolerance for all forms of corruption, bribery, facilitation payments, and improper advantages. NYAB prohibit any form of anti-competitive collaboration, such as cartel formation, price fixing, and market allocation and does not participate in any activities that are intended to restrict or distort fair competition.

NYAB complies and expects its suppliers and other business partners to comply with trade sanctions and relevant export control

laws and regulations. NYAB does not conduct business in violation of applicable anti-money laundering, anti-terrorism or financial crime laws.

NYAB shows moderation in hospitality and demonstrating gratitude. While hospitably, the hospitality itself and any business gifts given or receiving must be moderate. Offering or receiving inappropriate financial benefits to promote any business relationship is strictly forbidden. NYAB's employees are responsible for ensuring that this is implemented in work with customers, stakeholders and other business partners. NYAB adheres to good business ethics and

legislation and corruption in all its forms is strictly forbidden and cannot be found in any of NYAB's operations nor its supply chain. Any situation that may involve a conflict of interest, or the appearance of a conflict of interest, between NYAB and its business partners shall be avoided.

Privacy

NYAB respects its personnel's and everyone else's right to privacy. NYAB follow and adhere to all applicable data protection laws and regulations.

Sustainable society

Environment

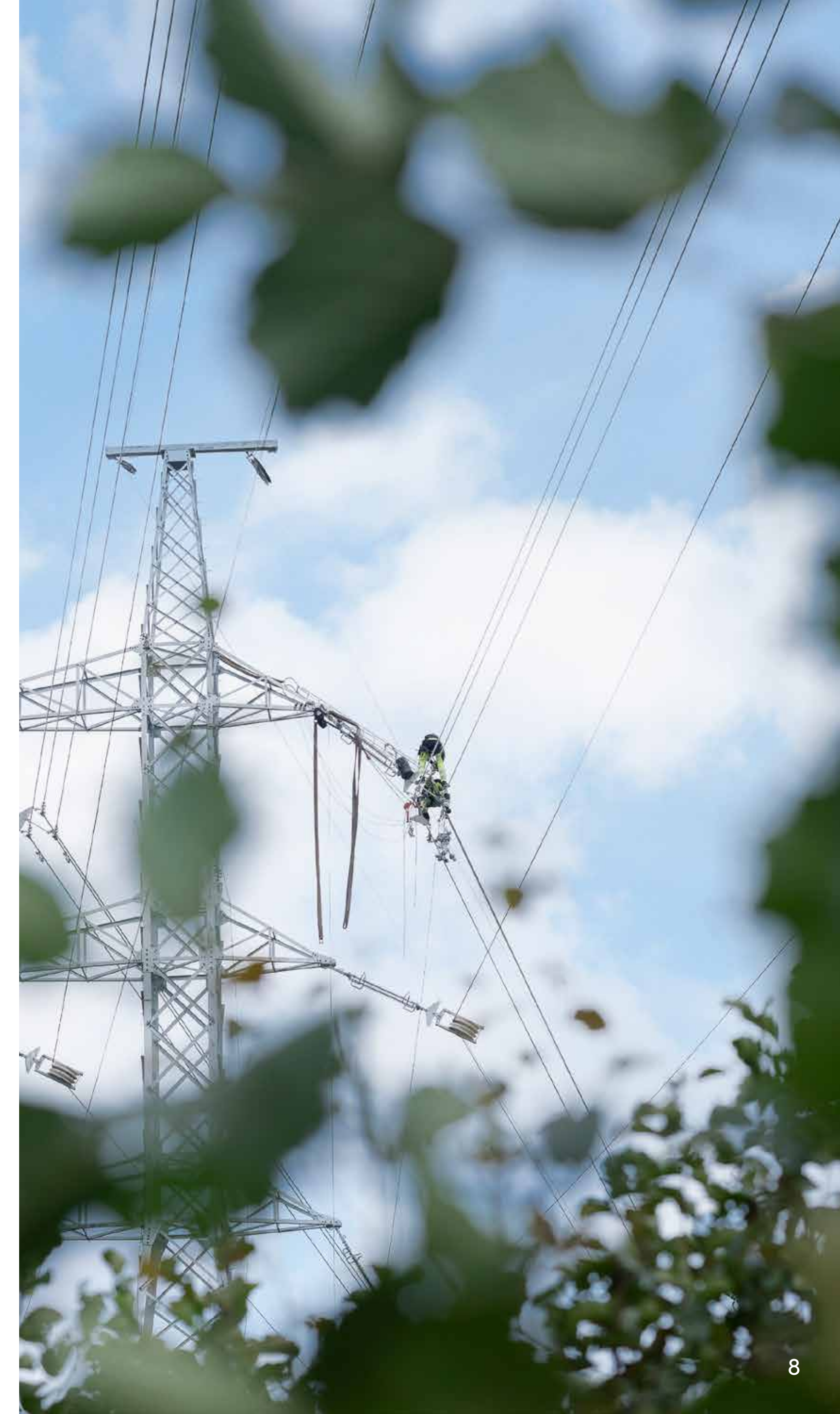
NYAB conducts its operations with respect for the environment and strives for a sustainable development. We comply with environmental laws and industry standards, work to reduce negative environmental impact, and reduce greenhouse gas emissions in projects and the supply chain. We promote responsible resource use, proper waste management and recycling, and select materials and methods with climate considerations. Environmental risks are assessed during planning and execution, and NYAB encourages continuous improvement and collaboration with stakeholders to improve the sustainability in projects.

NYAB follows the Group's overarching Sustainability Policy and expects its suppliers to do the same, ensuring that all sustainability efforts within the organization are aligned with these principles.

Quality

Quality is the basis for everything at NYAB. NYAB believes that ensuring quality in its actions and choices creates the preconditions for sustainable development.

NYAB expects a high-quality provision of services and products on schedule, at the agreed price, safely and securely.



Speaking up

NYAB promotes responsible business methods and fosters an ethical way of acting. NYAB takes all illegal, unethical or any acts that go against its guidelines seriously. NYAB encourages its employees, suppliers, associates and other stakeholders to, in good faith, bring these to NYAB's attention every time there is a suspicion of misconduct.

NYAB primarily encourages suppliers to contact their contact person in NYAB's organization. However, if this is not an option, or the whistleblower prefers to be anonymous, a concern can always be reported via the reporting channel (whistleblowing) on our website.

The reporting channel is provided by an external and impartial service provider, Lexia Attorneys, who is also responsible for the processing of reports together with the Audit Committee of the Board of Directors. All reports are investigated confidentially and in accordance with specified procedures.

Possible actions are taken only after the investigation has been concluded. The information from the report or the investigation can only be accessed by the people who need it to complete the investigation. can only be accessed by the people who need it to complete the investigation.

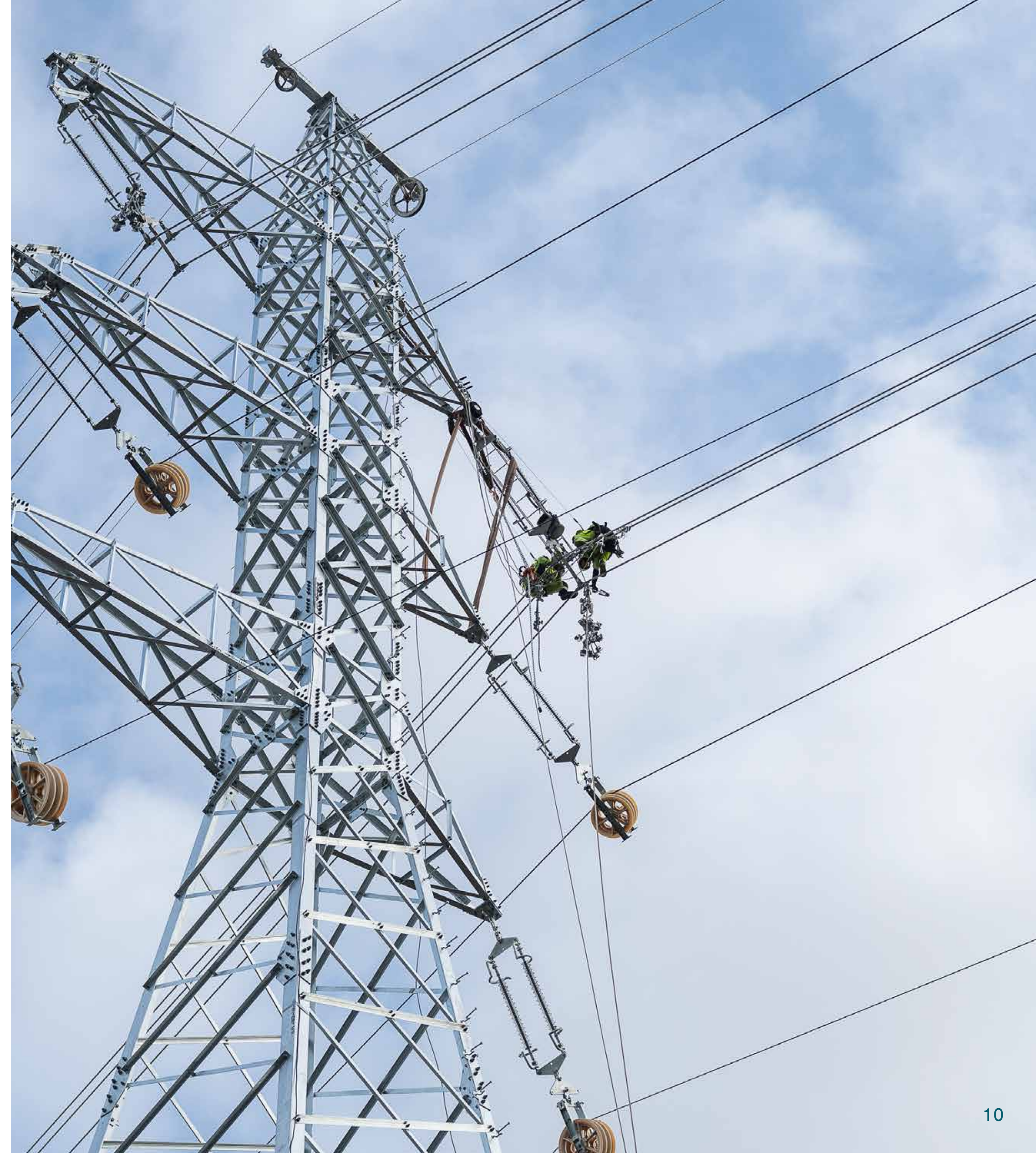
Raising concerns:

- As an external stakeholder: discuss with the contact person in our organization
- If the previous options are not available or appropriate, the anonymous reporting channel for whistleblowers can be used.

Follow-up

NYAB reserves the right to carry out announced or unannounced audits, follow-ups, supplier rounds, checks and inspections of the supplier and its subcontractors at all levels. This includes monitoring all suppliers active in the project, regarding compliance with social requirements, labor law conditions, anti-discrimination, taxes and social security contributions and other requirements according to the contract and code of conduct. The supplier must participate in the follow-up and provide necessary documentation upon request.

In the event of deviations, the supplier must draw up and implement an action plan to ensure that social requirements are met throughout the supply chain.



Policy approval, validation and distribution

Approval

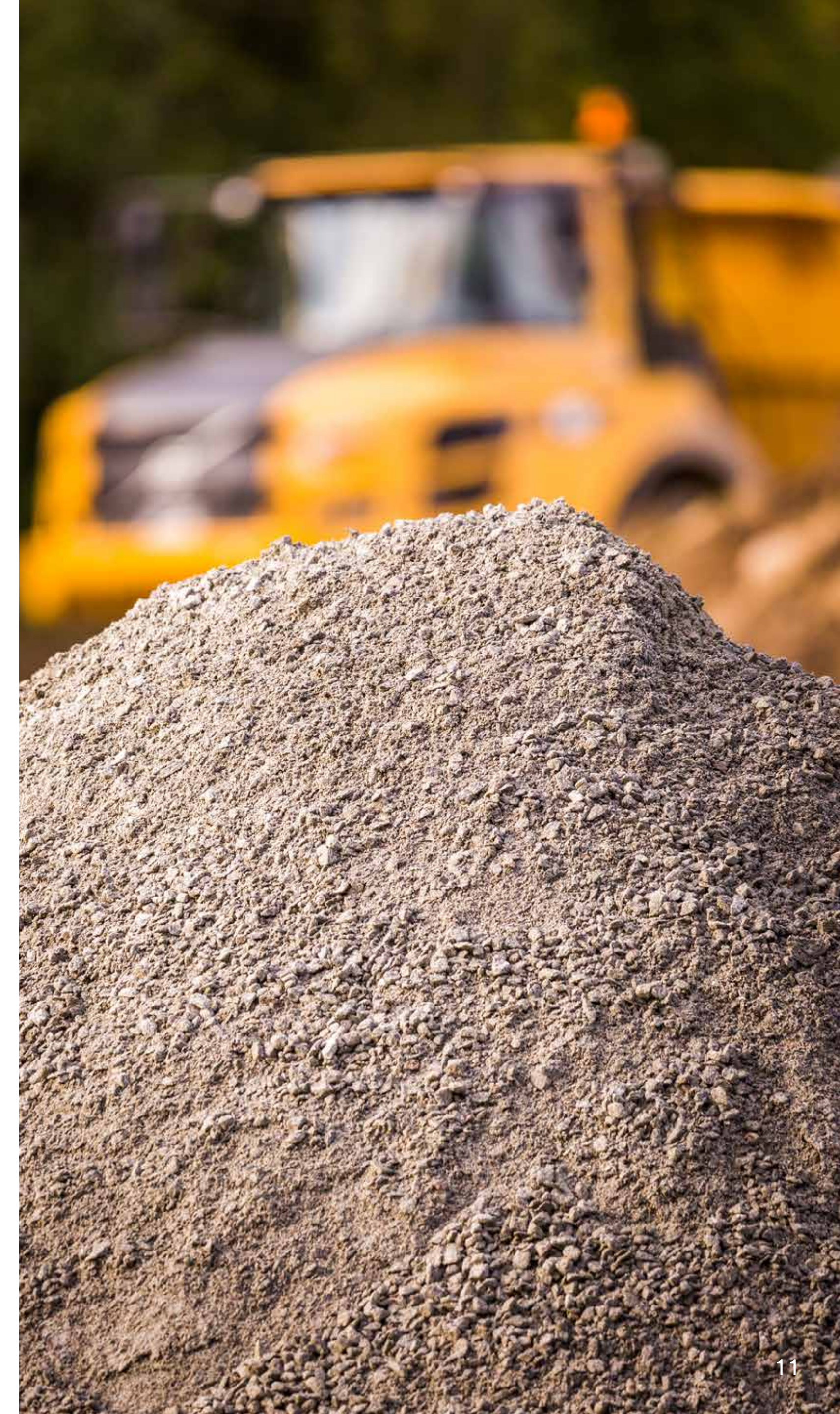
This directive are subject to approval by the Group CEO.

Distribution

This Directives are to be accepted by all suppliers of NYAB Group companies.

Related documents

- Code of Conduct of NYAB
- Sustainability policy





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First adopted 09/2023. Latest update 12/2025. Copywrite NYAB Group.

The Code of Conduct is available in several languages. In case of conflict between the language versions, the English language version prevails.

