

# Nobian Business Partner Code of Conduct

Effective May 2023

## Why do we have this Policy?

Part of the success of Nobian Coöperatief U.A. and its subsidiary companies (“Nobian”) is that we are always committed to conduct business with integrity and fairness, with respect for the law and based on our values. This commitment is outlined in our Nobian Code of Business Conduct & Ethics and embedded in our values:

- Safety
- Excellence
- Care
- Ownership

Similarly, we expect all our business partners to comply with all applicable laws and regulations and to embody, at all times, the guiding ethical principles outlined in this Business Partner Code of Conduct.



## What do we expect from our business partners?

### 1. To comply with applicable laws

Business partners must maintain awareness of and comply with all applicable laws and regulations of the countries where they operate, including – where applicable – anti-corruption laws, customs regulations, export and trade control laws, privacy laws and local labor and employment laws and international fair labor standards.

Business partners will, at all times, comply with applicable anti-competition, antitrust laws and fair dealing laws, including not sharing unnecessary commercially sensitive information of the business partner, or other third parties, with Nobian.

Business partners shall take appropriate steps to protect Nobian’s proprietary or confidential information, including employee information, customer data, intellectual property and trade secrets.

### 2. To conduct business ethically

Business partners cannot use cash, gifts or other forms or remuneration to obtain or retain business. Business partners are also prohibited from providing Nobian employees with anything of value, including meals, gifts or entertainment in order to obtain or retain business or influence a business decision, with the exception that business courtesies of a nominal value of less than €50 may be offered to Nobian employees, whenever appropriate given the circumstances. Business partners must maintain accurate books and records of all meals, gifts, entertainment and related payments.

### **3. To respect human rights**

Business partners must cultivate a respectful and inclusive work environment free of discrimination and harassment. They must also ensure that they comply with all applicable local labor and employment laws and international fair labor standards and that their supply chains do not allow or facilitate child-labor, forced labor or human trafficking.

### **4. To provide a safe and healthy working environment**

Safety is a priority for Nobian and one of our company values. It is our foremost responsibility to ensure everyone returns home safely every day. We therefore expect from our business partners to provide a safe, clean and healthy working environment that utilizes reasonable measures to prevent occupational injuries and safety incidents.

### **5. To protect the environment**

Business partners will comply with all applicable environmental laws and regulations and utilize best efforts to implement best practices and industry standards for environmental protection. Business partners will, to the extent possible, ensure that raw materials are sourced in a way that minimizes waste, deforestation, and other negative impacts on the environment and local communities.

### **6. To adhere to responsible sourcing standards**

Business partners will comply with and cooperate with Nobian's need to comply with laws and regulations related to conflict minerals, modern slavery, and other responsible sourcing initiatives.

Nobian measures the sustainability and ethical sourcing performance of its suppliers in accordance with Nobian's Sustainable Procurement Policy.

## **How do we ensure compliance with our Business Partner Code of Conduct?**

We expect our business partners to maintain necessary documentation to demonstrate compliance with the principles stipulated in this Business Partner Code of Conduct and reserves the right to assess, monitor and audit business partner's compliance with this Business Partner Code of Conduct. Collaboration with business partner's who are not in compliance with this Business Partner Code of Conduct may be terminated and/or precluded from consideration of future business. Business partners must promptly implement corrective actions in case of non-compliance with this Business Partner Code of Conduct.

## **Reporting concerns or complaints**

Business partners will provide their employees and third parties with an anonymous channel to report (potential) violations of law, regulation, policy or this Business Partner Code of Conduct. Business partners will prohibit any retaliation against their employees, or third parties, who raise good faith concerns.

Any concerns about a business partner or Nobian's compliance with this Policy should be directed to Nobian's SpeakUp! reporting system. Please visit the [www.nobian.ethicspoint.com](http://www.nobian.ethicspoint.com) for more information. A business partner's relationship with Nobian will not be affected nor will the business partner be retaliated against in any way by an honest report of (potential) misconduct.

Functional Owner: Legal  
Approved by: Procurement