

Supplier Code of Conduct

Rev. 1.0

1.0 Introduction

At Nito, we wish to act responsibly and to run our business in a sustainable and responsible way.

We follow the internationally agreed core principles on human rights, environment, and anti-corruption. This enables us to identify, prevent or mitigate and account for any adverse impacts on human rights, environment and anti-corruption occurring as a result of our own activities, or through the operations of our business relationships.

Our suppliers play a central role in our mission to develop more sustainable and responsible business practices. As such, we expect our suppliers to also run their operation in a responsible way and to manage adverse impacts on human rights, environment, and anti-corruption within their business.

This Code of Conduct provides the foundation for our continuous collaboration with our suppliers on their ethical, social, and environmental performance.

2.0 Our expectation

We follow applicable regulations wherever we operate. In the same way, we expect our suppliers to keep updated on and follow all applicable national and international laws and regulations and to comply with the international principles for sustainable and responsible business conduct.

In line with our own ambitions, we expect that, at a minimum, our suppliers address:

- negative impacts on human rights stated in the International Bill of Human Rights, including the core labour rights (ILO)
- negative impacts on the environment in relations to areas addressed by the EU Taxonomy, the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement
- issues related to corruption, as outlined by the United Nations Convention against Corruption.

Moreover, we expect our suppliers to ask their respective suppliers to demonstrate responsible business conduct in relation to social, environmental, and economic sustainability too.

3.0 Human Rights including Labour Rights

At Nito we run our business in a responsible way and follow the internationally agreed core principles on human and labour rights.

The principles are made operational through the UN Guiding Principles on Business and Human Rights (UNGPs).

In line with our own ambitions, we expect our suppliers to:

- have due diligence processes in place to identify, prevent or mitigate and account for actual and potential impacts on human and labour rights, as outlined by the UNGPs.

The responsibility to respect human rights refers to internationally recognized human rights contained in the International Bill of Human Rights. We are aware, that in practice, some human rights may be at greater risk than others in particular industries and contexts. However, all human rights should be the subject of periodic review.

3.1 Health and Safety

At Nito, it is a top priority for us that all employees are able to leave the company just as healthy and fit as when they arrived. To that end, we strive to ensure a safe, good, and healthy working environment for our employees.

In line with our own ambitions, we expect our suppliers to:

- provide a secure and healthy working environment for all their workforce.
- develop and implement effective health and safety management systems. These systems must identify risks, measure, and monitor performance, and drive continuous improvement to mitigate or minimize health and safety risks.

4.0 Environment and Sustainability

At Nito, we equate sustainability with responsibility for both people and the environment. We strive to comply with all relevant compliance obligations, both in relation to our operational activities, services, and the products in our portfolio.

We work actively on reducing our total environmental impact, by offering more environmentally friendly transport solutions and, from a lifecycle perspective, more sustainable products to our customers. We also take steps to reduce the total energy consumption of operational activities. Our approach to sustainability is largely driven by our customers' demand and needs in this area.

We expect our suppliers to support this responsibility by offering sustainable solutions, services, and products throughout the entire supply chain and to implement proper environmental management systems where applicable. Moreover, we expect our suppliers to comply with all applicable laws and regulations regarding sustainability solutions.



The following highlights are specific examples of minimum expectations of supplier performance:

At Nito, we aim to have sustainability considerations incorporated as an integral part of our business activities and strive to reduce the adverse impact of these business activities. The sustainability policy is supported by initiatives and actions to reduce CO2 emissions.

In line with our own ambitions, we expect our suppliers to:

- seek out actions to reduce CO2 emissions in their own operations, products, and services.
- identify, label, and manage hazardous substances, chemicals, waste, and other materials posing danger to humans or the environment, to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.
- seek out actions to manage resources, including waste, in a sustainable and circular way.

5.0 Anti-Corruption

At Nito, we conduct all our business in an honest and ethical manner and maintain a zero-tolerance policy on corruption.

In line with our own ambitions, we expect our suppliers:

- not to engage in any form of corrupt practice, including extortion, fraud, bribery, facilitation payment, or money laundry
- to comply with all laws, rules, and regulations relevant to anti-corruption.

6.0 Responsible Sourcing of Minerals

Nito wishes to run its business in a responsible and ethically sound way.

Therefore, Nito dissociates itself from the use of resources which may have the center of conflicts or human rights abuse. This includes conflict minerals.

Consequently, Nito does not procure 3TG minerals directly from mines or smelters.

In line with our own ambitions, we expect our suppliers to:

- adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture. The purpose is to reasonably assure that minerals are sourced in a way consistent with the OECD's Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

7.0 Contractual Arrangements

We expect our suppliers to cooperate by answering questions, delivering data related to compliance and sustainability, carrying out self-assessments, and - if deemed necessary - to cooperate with Nito in addressing specific impacts.

If necessary, suppliers must accommodate visits from Nito to assert compliance. This includes providing physical access for any representative from Nito or designated independent third parties.



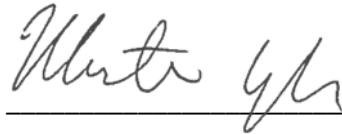
If our supplier causes, contributes to, or is linked to severe impacts, the supplier must notify Nito immediately and account for what actions the supplier has taken to end, prevent or mitigate the reoccurrence of the severe impacts.

If a supplier fails to comply with our expectations, described in this CoC, the suppliers must self-correct within a fixed period.

We are aware that improving ethical, social, and environmental performance requires resources and time. However, by failure to notify about severe impacts, failure to self-correct or failure to demonstrate willingness to address identified adverse impacts, Nito reserves the right to end the business relationship immediately.

Date:

Haderslev 12th of September 2023



Martin Kragh
CEO
Nito A/S

