



# Code of conduct NGI A/S

### Introduction

The surrounding world is making increasing demands on companies to act in a responsible way in relation to society, the environment, and employees.

As a global company, NGI A/S has a Code of Conduct (CoC) to support our values, integrity, and way of doing business. Our CoC is fundamental to our strategic business understanding and the way we do business. The CoC is a set of ethical and moral rules which we expect our employees and cooperation partners to follow at all times. Working all over the world, we face dilemmas and challenges every day, and the CoC will support partners during their daily activities in making informed decisions.

We firmly believe that we should behave towards the world around us, which includes society in general, beyond the requirements and regulation. Our employees are educated and trained in applying with the CoC. The CoC applies in all countries in which we do business. In cases where national law is stricter, national law takes precedent.

The purpose of this CoC is to make sure that NGI A/S' products are manufactured in a way that characterizes a company that acts in a responsible way in relation to all stakeholders. We aim to establish long lasting relationships with our suppliers and customers to our mutual benefit. It is the intention to encourage commitment to responsible manufacturing and trading. We build our business on cooperation, innovation, and knowledge-sharing. We aim to improve the hygienic standards worldwide and continuously develop and innovate our products and concepts to satisfy the requirements of our customers. NGI A/S respects the culture, customs, and traditions of the countries in which our suppliers and customers work.

### **Customer satisfaction is our main focus when designing and manufacturing our hygienic components and solutions. Therefore, we offer and guarantee the following to our customers:**

We expect that our suppliers comply with all order confirmations and agreements made regarding time of delivery, price, quality etc. in order for NGI A/S to comply with the above to our customers.

- All types of high-quality hygienic components and solutions at competitive prices
- No minimum order quantities
- No levelling project is impossible for NGI
- Incoming orders packed and shipped the same day
- Quick order confirmation (within 24 hours)
- Maximum 12-hours response time to customer enquiries
- Worldwide delivery 1-6 days
- Optional express delivery (next day)
- Track & trace on all shipments

### General requirements

All the companies that NGI A/S do business with must as a minimum comply with local laws and regulations in their countries of operation. Should any of the specific provisions of this CoC legally conflict with national or local laws, the applicable laws should always prevail; in these cases, NGI A/S should be notified.

All the companies that NGI A/S do business with must act in compliance with national and international competition, legislation, and regulation, and they must follow the WTO's legal ground-rules for international commerce to obtain open, fair, and undistorted competition.

NGI A/S requires our suppliers to communicate and use this CoC in cooperation with their own suppliers for materials, components and services delivered to NGI A/S.

### Human rights and labour rights

We expect all the companies that NGI A/S do business with to adhere to UN Global Compact and maintain high standards in taking care of their employees and the environment in which they work.

NGI A/S respects the fact that not only Governments can ensure that Human Rights are upheld. Therefore, NGI A/S recognizes our responsibility in respecting and acknowledging that remediation must be provided if NGI A/S business leads to violation of Human Rights. NGI A/S expects its suppliers and customers to respect UN Global Compact and its Ten Principles, as well as recognizing that remediation must be provided if there are breaches to the Ten Principles.

### Discrimination and harassment

NGI A/S will not conduct business with suppliers or customers who discriminate against employees or applicants based on their caste, national origin, ethnicity, religion, age, disability, gender, material status, sexual orientation, union membership, political affiliation, health, pregnancy, or any other form of discrimination.

NGI A/S does not accept bullying or the punishment of employees. NGI A/S will not accept the use of physical, psychological, verbal, or sexual harassment towards any of the supplier's or customer's employees or any employee of NGI A/S.

### Inclusion and diversity

NGI A/S commitment to inclusion and diversity contributes to different perspectives and innovative ideas and solutions that enable us to improve every day.

NGI A/S Suppliers must treat employees with respect and dignity, encourage diversity of the workforce, promote equal opportunity and equitable treatment for all, and foster an inclusive and ethical culture. NGI A/S expects its Suppliers to promote diversity in their supply chains and to purchase from diverse businesses.

### Freedom of association and collective bargaining

NGI A/S suppliers must recognize the structured social dialogue and respect the rights of workers to bargain collectively and to exercise lawful rights of free association, including joining or not joining any association.

NGI A/S suppliers must have appointed labor union representatives and working environment representatives who can ensure that collective agreements, Health and Safety measures is complied with at all time.

### Health and safety

All the companies that NGI A/S do business with must provide a clean, safe, and healthy working environment for all employees. The companies that NGI A/S do business with must comply with all applicable national laws and regulations. At a minimum:

- Workers must not be exposed to dangerous work without being properly protected
- Workers are instructed in the use of Personal Protective Equipment and usage must be enforced
- Facility management should support the formation of a workers' Health and Safety committee
- Facilities must ensure that there are adequate fire alarms and extinguishers and clear instructions on evacuation and the use of fire equipment and that they are in compliance with laws and regulations
- Facilities must provide appropriate light and ventilation
- Hazardous materials must be stored correctly and in a safe and maintained space and used by trained
- Machinery must be shielded and properly maintained
- Facilities for meals, resting and sleeping must be kept clean and safe, if these are provided.

### Prevention of injuries

A thorough risk assessment must be conducted to ensure that employees do not work in a dangerous environment. Are any high-risk areas found and unable to be eliminated the companies that NGI A/S do business with must supply personal protection equipment and risk areas must be clearly signed.

Promptly report HS incidents (such as spills, non-compliant emissions, occupationally related injuries, and illness, etc.) to local management

There must at all times be sufficient employees trained in first aid and first aid equipment for them to use.

### Working hours

Employees must be treated within the applicable national or local laws regarding employment. Working hours should be mutually agreed upon between the company and the employees. In companies where an organized labour union exists working hours should be defined through the collective bargaining process.

Working hours must not exceed more than 48 hours a week, including overtime. Working hours should always be within the legal limit according to national laws and regulations. There must be compensation for overtime work which should follow national laws and regulations. Employees are entitled to refuse overtime without incrimination.

Employees are entitled to at least the statutory legal minimum wage, or the standard benchmark rate in the industry, whichever is higher, and should always be enough to meet basic needs – living wages set by law.

### Child labour / young workers

NGI A/S believes that all children have the right to a childhood and an education. All the companies that NGI A/S do business with must ensure that no person shall be employed at an age younger than 15 or younger than the age of completing compulsory education. Where national law permits, workers of 12 to 15 of age may undertake light work a few hours a week provided it is not likely to neither be harmful to their physical or mental health and development nor prejudice their attendance at school.

Young workers under the age of 18 years must not be employed in hazardous work or do nightshifts.

Should a child below the age of 15 be found at one of NGI A/S suppliers we expect the supplier to take full responsibility and not fire the child but ensure that the child will go to school, and a monthly compensation will be provided to the family.

### Human trafficking and forced labor

NGI A/S is committed to preventing human trafficking and forced labor (including but not limited to debt bonded, indentured, and slave labor) in its operations and supply chains.

Suppliers must not use these practices or allow them anywhere in their supply chains. Suppliers are prohibited from any conduct that could be indicative of forced labor, as identified by the International Labour Organization (abuse of vulnerability, deception, restriction of movement, isolation, physical or sexual violence, intimidation or threats, retention of identity documents, withholding of wages, debt bondage, abusive working or living conditions, or excessive overtime).

### Ethics

NGI A/S expects that the companies that NGI A/S do business with to always conduct themselves in an ethical and morally correct way.

This includes the treatment of own employees, NGI A/S employees, sub-suppliers to NGI A/S and the local population.

### Corruption and anti-bribery

NGI A/S does not accept bribery or attempts of bribery, corruption, extortion, or embezzlement.

Should a supplier or customer be found to be using or accepting bribery, corruption, extortion, or embezzlement the partnership between NGI A/S and the supplier and customer will be reconsidered and may be terminated.

This includes the promising, offering, giving, or accepting of any improper monetary benefits or other incentives. Suppliers and customers must train their employees in what corruption, bribery, extortion, and embezzlement are and how to prevent it.

### Environmental compliance and sustainability

NGI A/S Suppliers shall have an effective environmental management system and conduct their operations in an environmentally responsible way.

Suppliers shall commit to reducing the environmental impact of its processes, products, and services. NGI A/S has committed to 2030 and 2050 environmental sustainability targets and we welcome collaboration with our suppliers to further the impact of our journey.

- **Regulatory Compliance:** NGI A/S Suppliers shall comply with all applicable regulations, including keeping current and in compliance with all required environmental permits, licenses, approvals, and registrations.
- **Pollution Prevention and Resource Reduction:** NGI A/S Suppliers shall avoid pollution, actively strive to reduce material consumption, and consider the use of renewable resources.
- **Chemicals and Hazardous Materials:** NGI A/S Suppliers shall ensure that all chemicals and hazardous materials are identified, labelled, handled, transported, stored, and disposed of in an environmentally safe way and as required by law. Suppliers are encouraged to track continuous improvement in hazardous material reduction opportunities.
- **Air Emissions:** NGI A/S Suppliers shall ensure that air emissions (e.g., of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations) are to be characterized, monitored, controlled, and treated and discharged as required by law or permit. Suppliers shall have programs in place to ensure continuous improvement in their emissions of greenhouse gases.
- **Energy and Greenhouse Gas Emissions:** NGI A/S Suppliers shall identify and track energy use and associated Greenhouse Gas Emissions resulting from that energy use. NGI A/S Suppliers shall have energy efficiency and Greenhouse Gas Emission reduction strategies in place for continuous improvement.

NGI A/S Suppliers shall, upon request, provide NGI A/S with accurate and complete information and certifications related to energy usage and greenhouse gas emissions associated with products or services provided to NGI A/S.

- **Wastewater and Solid Waste:** NGI A/S Suppliers shall ensure that wastewater and solid waste generated from operations, industrial processes and sanitation facilities are monitored, controlled, and treated, discharged, or disposed of as required by law or permit prior to discharge or disposal.
- **Recycling and Reuse:** NGI A/S Suppliers shall contribute to the recycling and reuse of materials and products to the extent possible and as required by law.

### Whistleblowing

All NGI A/S employees, consultants and suppliers are expected to comply with NGI A/S Code of Conduct and actively support its values and principles.

Any employee who fails to comply with the Code, or who withholds information during an investigation regarding a possible violation, is subject to disciplinary action up to and including dismissal. Any consultant or supplier who fails to comply with the Code may see their contract terminated or not renewed.

Violations or suspected violations of the Code must be reported immediately to one of the following:

- Your department or function head
- Use the whistle-blowing procedure listed on the “NGI INTRANET”

All information will, to the extent possible, be received in confidence. No retaliatory action will be taken against anyone for making in good faith a report of a violation. However, anyone who takes part in a prohibited activity may be disciplined even if they report it.

### Responsibility

Executives and senior management are held accountable for all aspects of implementation, communication, evaluation, and enforcement of this code of conduct.

Conventions respected in this Code of Conduct:

- UN Guiding Principles on Business and Human Rights, 2011
- International Labour Convention, revised version 2014.



