NORATEL GROUP Supplier Code of Conduct

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1.1 Purpose

This Code of Conduct defines the basic requirements placed on suppliers of goods and services to NORATEL, in particular their responsibilities towards their stakeholders and the environment. The principles expressed in this Supplier Code of Conduct comprise an important component of supplier selection and evaluation, as well as reflecting the environmental, social and governance principles that Noratel incorporates in all aspects of its business. NORATEL are working against and following the 10 principals according to the UN Global Compact and following the requirements in UK Legislation - Modern Slavery Act.
NORATEL reserves the right to reasonably change the requirements of this Code of Conduct. In such an event, NORATEL expects the supplier to accept such reasonable changes.

1.2 Scope

This code of conduct applies to all suppliers currently supplying goods and services to any NORATEL Group business.

1.3 Carbon Emissions

The NORATEL Group has implemented a target to reduce our carbon emissions to net zero (Scope 1 & 2) by 2030. Along with the focus on selling into markets that are aligned with a sustainable future, this target reflects the Group's commitment to reducing the impact of its operations on the environment.
Suppliers should be committed to helping the Group meet its environmental commitments. Suppliers should be seeking to reduce negative environmental impacts including the prevention of pollution. We expect our suppliers to encourage the use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout their supply chain.
Suppliers shall implement an environmental management system according to the guidelines of ISO14001:2015. NORATEL would value suppliers who are working towards or have a certified management system according to ISO14001:2015.

1.4 Ethical Requirements

To meet social responsibilities, suppliers shall conduct their business in an ethical manner and act with integrity. Ethical requirements include the following aspects:

1.4.1 Business Integrity: Suppliers shall not practice or tolerate any form of corruption, extortion, embezzlement, or money laundering. Suppliers shall not offer or accept bribes or other unlawful incentives (e.g. facilitation payments) to or from their business partners or government officials. Suppliers shall not offer to NORATEL employees any kind of gifts or personal benefit which could be perceived as a bribe. In all cases, gifts or entertainment shall not be offered to improperly influence a business relationship and must not violate applicable laws or ethical standards.

1.4.2 Conflicts of Interest: Suppliers shall disclose to the business any situation that could constitute a conflict of interest, such as NORATEL employees having professional, private and/or significant financial advantages or interests in any of the supplier's businesses.

1.4.3 Fair Competition: Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

1.4.4 Conflict Minerals: Suppliers shall ensure that products supplied to NORATEL do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups and cause or foster human rights abuses.

1.4.5 Facilitation of tax evasion: Suppliers will comply fully with all of their obligations in relation to all taxes due within the territories in which they operate or make supplies. Suppliers must not participate in tax evasion nor facilitate tax evasion by others. Suppliers should take appropriate steps to ensure that all who act for or on their behalf also comply with such obligations.

1.5 People and labour

Suppliers shall protect the human rights of their employees and treat them with dignity and respect. This includes the following aspects:

1.5.1 Child labour: We do not tolerate child labour in our supply chain.
Suppliers must avoid any sort of child labour in their business operations consistent with the International Labour Organization's (ILO) core labour standards and the United Nations Global Compact principles.

1.5.2 Freely chosen employment: We do not tolerate slavery, servitude and forced or compulsory labour and human trafficking in our supply chain.
Bonded, indentured or involuntary prison labour also is not accepted.

1.5.3 Working time, wages, and benefits: Suppliers should commit to the elimination of excessive working hours. Working time for suppliers' employees shall not exceed the maximum set by the applicable national law and by ILO standards. Compensation shall be paid to employees regularly, in a timely manner and in full, according to applicable laws, and must comply with applicable national wage laws. Compensation and benefits should aim at providing a minimum living wage to ensure an adequate standard of living for employees and their families. Unless otherwise provided by local laws, deductions from basic wages as a disciplinary measure shall not be permitted. Suppliers are expected to provide their employees with fair and competitive compensation and benefits and to support equal pay for work of equal value.

1.5.4 Fair treatment: Suppliers must provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, physical punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.

1.5.5 Inclusion and Diversity: Equal treatment of all employees and a commitment to non-discrimination must be a fundamental principle of the supplier's corporate policy. Typical discriminatory treatment takes into consideration – consciously or unconsciously – characteristics of an employee such as age, disability, ethnicity, family status, gender, gender expression, gender identity, genetic information, national origin, physical characteristics, political affiliation, pregnancy, religion, social origin, sexual orientation, union membership or any unlawful criterion under applicable law.

1.5.6 Freedom of association and collective bargaining: Suppliers shall recognise and respect the rights of employees to freely associate, organise and bargain collectively, if they so wish to. In situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, NORATEL expects suppliers to allow alternate forms of worker representations.

1.6 Health, safety, and environment

Suppliers shall make adequate provision for the health and safety of their employees, customers, visitors, contractors, and others who may be affected by their activities. They shall operate in an environmentally responsible and resource-efficient manner. This comprises the following aspects:

1.6.1 Occupational health and safety: Suppliers shall adequately protect their employees against chemical, biological and physical hazards. Physically demanding tasks and conditions in the workplace, as well as risks associated with infrastructures used, must be adequately managed to protect their employees. Suppliers shall provide appropriate safe work procedures, technical protective measures and adequate maintenance to mitigate health and safety risks in the workplace and to prevent accidents and occupational illnesses. In addition, suppliers shall provide employees with appropriate personal protective equipment. Safety information relating to any identified workplace risk or hazardous materials – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards. A safe and healthy working environment shall include as a minimum the provision of potable drinking water, adequate lighting, temperature, ventilation, sanitation and, if applicable, safe and healthy company living quarters. Suppliers shall implement an OH&S management system according to the guidelines of ISO45001:2018. NORATEL would value suppliers who are working towards or have a certified management system according to ISO45001:2018.

1.6.2 Product safety: Suppliers must comply with product safety regulations, label products properly and communicate product-handling requirements. They shall provide to relevant parties the applicable documentation containing all necessary safety-relevant information for all hazardous substances in case of a legitimate need.

1.6.3 Waste and emissions: Suppliers shall ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activity that has the potential to adversely impact human or environmental health shall be appropriately managed, measured and controlled. The release of hazardous substances shall be minimised.
Suppliers shall prevent or mitigate accidental spills and fugitive emissions of hazardous materials.

1.6.4 Natural resource conservation: Suppliers shall use natural resources (e.g. water, sources of energy, raw materials) in an economical way and preserve them. Negative impacts on the environment and climate caused by the suppliers or in their supply chain shall be minimised or eliminated at their source.

1.7 Quality

Suppliers shall meet generally recognized quality standards or contractually agreed quality requirements and standards. Suppliers shall immediately address all critical issues that have the potential to negatively affect the quality of goods and services. Suppliers must inform NORATEL about changes to the manufacturing or supply process that have the potential to impact the specification of goods and services provided.
Suppliers shall implement a quality management system according to the guidelines of ISO9001:2015. NORATEL would value suppliers who are working towards or have a certified management system according to ISO9001:2015.

1.8 Supply chain security

Suppliers shall implement appropriate measures to ensure the security and integrity of the supply chain in alignment with recognized standards such as ISO 28001 and applicable legal requirements. Suppliers shall identify, assess, and manage risks related to theft, unauthorized access, tampering, fraud, cyber threats, and disruption of logistics operations.
Suppliers shall ensure that goods, materials, and products supplied to NORATEL are protected during handling, storage, and transportation, and that traceability is maintained where applicable. Suppliers shall require their own suppliers and subcontractors to apply equivalent security standards.
Suppliers shall protect all NORATEL-related information, including commercial, technical, and personal data, against unauthorized access or misuse and ensure compliance with applicable data protection laws. Personal data shall only be processed for agreed purposes and not for the supplier's own use or that of third parties.
Suppliers shall implement appropriate information security controls and promptly notify NORATEL of any incident that may affect the security of products, information, or supply chain operations.

1.9 Governance

Suppliers shall implement effective management systems and a governance structure to facilitate compliance with all applicable laws with respect to the expectations set forth in this Supplier Code of Conduct. This includes the following aspects:

1.9.1 Legal and other requirements: Suppliers shall identify and comply with all applicable international, national, and local laws and regulations, contractual agreements and internationally recognised standards.
Suppliers shall support and implement the 10 principles of the UN Global compact, including Human Rights, Labour standards, Environment, anti-corruption, transparency, Modern Slavery, Whistleblowing, Anti-bribery and Corruption Programmer.
Suppliers shall also conform their practices to generally accepted industry standards, and shall obtain, maintain and keep up-to-date all applicable permits, certificates, licenses and registrations.

1.9.2 Right to evaluation: Suppliers shall grant NORATEL the right to evaluate their performance, upon reasonable prior notice, to determine supplier's conformance with the principles outlined in this Supplier Code of Conduct. Suppliers shall maintain documentation necessary to demonstrate conformance with the principles outlined in this Code of Conduct.

2.0 Implementation and continues improvement

NORATEL Supplier Code of Conduct constitutes an integral part of all contractual documents entered into between NORATEL and its Suppliers.
NORATEL requires its Suppliers to hereby represent and warrant to cascade the principles contained in this NORATEL Supplier Code of Conduct to their own suppliers and to implement a similar continuous improvement and compliance approach.
Compliance and improvement towards the above-mentioned principles is part of NORATEL's Suppliers overall assessment. Suppliers shall freely determine their appropriate improvement action plans to increase their performance in the field of sustainable development.
Since NORATEL is building its relationship with its Suppliers in a continuous improvement approach, NORATEL may support its Suppliers in the definition and implementation of action plans aimed at improving their performance in the fields envisaged by this NORATEL Supplier Code of Conduct.

I HEREBY ACKNOWLEDGE that I am an authorized representative of the company referenced below, have carefully reviewed and understood the substance of the above document, and confirm that this company is in full compliance with NORATEL Supplier Code of Conduct.

Supplier Company Name: _____

Supplier representative name (Block Capitals):_____

Title of supplier representative (Block Capitals):_____

Date: _____

Signature and company stamp:_____

Original copy to be signed and sent back to NORATEL sourcing manager.