

## Supplier Code of Conduct

Neles strives to be the best choice for sustainable processing and flow of natural resources. We pursue to work with suppliers who are socially, environmentally, and economically responsible and who share our values:

- Customer success is our success
- We strive for better together
- We build and share expertise
- We keep our promises

Neles purchases materials, components, and services on a global basis. We acknowledge that our supply chain activities have a broad impact and that our responsibilities extend beyond our own operations and into those of our suppliers.

Neles' operations are guided by Neles Code of Conduct and the United Nation's Global Compact Initiative. Neles respects and supports the protection of internationally proclaimed human rights, such as those described in the United Nations (UN) Guiding Principles on Business and Human Rights and the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work.

Neles expects its suppliers to make every effort to always comply with this Supplier Code of Conduct when dealing with Neles.

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### Health and Safety

Supplier shall provide a safe and healthy working environment and take all practicable steps to prevent injuries.

Supplier is encouraged to have a health and safety program appropriate in relation to the nature of business and its risks. The Supplier shall provide relevant health and safety information and instructions, training, personal protective equipment, and tools to its employees. Supplier's employees shall not be under the influence of alcohol or illegal drugs while working for Neles projects.

### Child and forced labor

Supplier shall not use, or support any use of, child or forced labor.

All employees are free to leave their employment upon a reasonable notice as required by the local law or contract.

Supplier shall not require employees to lodge deposits of money or identity papers with their employer.

### Non-discrimination

Supplier shall treat its employees with dignity and respect. The Supplier shall not discriminate its employees based on their gender, age, religion, marital status, sexual orientation, political opinion, or national or ethnic origin, or another similar characteristic. The Supplier shall not tolerate any form of harassment or discrimination, whether physical or verbal.

### Wages and working hours

Supplier shall provide wages and benefits that meet or exceed the national legal standards.

Supplier shall comply with all applicable laws and regulations on working hours and maintain accurate books and records thereof.

### Freedom of association

Supplier shall respect its employees' freedom of association, right to freely choose their representatives and right to collective bargaining.

### Environment and climate change

Supplier is encouraged to have a systematic approach to protect the environment.

Supplier shall:

- be committed to protect the environment in accordance with the applicable laws and regulations
- continually look for ways to minimize waste, emissions and discharge of their operations, products and services
- use energy and raw materials resources efficiently

Supplier is encouraged to determine the carbon footprint of its own operations, suppliers, and products.

Throughout the world, there are laws and regulations (e.g., RoHS and REACH) which prohibit or restrict certain substances and/or require manufacturers and suppliers to

provide information about restricted substances in their products. Suppliers must, therefore, comply with the most recent version of EU SVHC (Substances of very high concern) list and, when requested by Neles, provide regulatory compliance declarations for identified products.

### Sourcing conflict minerals

The Supplier must be committed to sourcing conflict minerals (3TG) only in accordance with the existing international standards and applicable laws and regulations. The Supplier must not contribute to human rights abuses, corruption, the financing of armed groups, or similar negative effects.

### Supplier management system

Suppliers are expected to have a management system that ensures they comply with applicable laws, regulations, Neles HSE policy and this Supplier Code of Conduct. The management system should promote continuous improvement and compliance with constantly changing laws and regulations. An environmental, occupational health and safety and quality management systems (ISO 14001, ISO 45001, ISO 9001) are strongly recommended.

### Anti-corruption

Neles has zero tolerance towards bribery and corruption and expects the same from its suppliers. Supplier must never request, accept, pay or offer bribes or facilitation payments, whether directly or indirectly through a third party, to influence a business decision or to otherwise obtain a business advantage. This applies to business both in public and private sector. All gifts, entertainment and hospitality must have a legitimate business purpose and they must be acceptable under the local laws and business practices. Giving or receiving cash gifts shall not be accepted.

Neles expect Supplier to establish processes to prevent corruption, for example, by setting up an anti-corruption policy and providing relevant training to their employees.

### Conflict of interest

Supplier shall avoid potential conflicts of interest involving its work with Neles. The Supplier shall disclose to Neles any conflict of interest or situations giving appearance of a conflict of interest, for example, if Neles employee or his/her immediately family member:

- holds a material financial or other interest in the Supplier
- holds a managerial position at the Supplier or
- works for the Supplier and such employment creates a conflict of interest or appearance thereof.

### Company assets and data

Supplier shall safeguard Neles' intellectual property and data, including personal data, in accordance to all applicable laws and the contract, and shall ensure that the level of its information security is adequate to keep all such information confidential and secure.

Supplier shall not sell Neles any products which violate intellectual property rights of a third party.

### Fair competition

Supplier shall compete fairly and comply with the applicable competition laws and regulations in the countries where they operate. For example, the Supplier shall not enter into any agreement with its competitors to fix prices or limit the availability of products.

### Trade sanctions and export control

Supplier shall not purchase materials, components, products or services from suppliers who are subject to the trade or economic sanctions imposed by the European Union, United Kingdom or the United States or by any local authorities.

Supplier shall ensure that the materials, components, products and services sold to Neles can be exported by Neles without any license. The Supplier shall immediately advise Neles in advance an export license is needed.

### Compliance with laws and regulations

Supplier shall be aware of, and work within the applicable laws and regulations in the countries they operate. This includes adhering to regulatory best practices. Neles expect the Supplier to be a good citizen wherever they operate.

### Sub-suppliers

Supplier shall ensure that its own suppliers shall adhere to these Supplier Code of Conduct (or comparable requirements). The Supplier shall evaluate and monitor its supply chain, and upon request collect relevant information to Neles regarding the supply chain's compliance of this Supplier Code of Conduct.

### Monitoring and follow up

Neles encourages Supplier to implement and maintain management systems and standards and to appoint responsible company representatives who shall ensure compliance with the applicable laws and regulations, the Supplier's contract with Neles and this Supplier Code of Conduct.

Neles expects the Supplier's co-operation in verifying compliance e.g. in completing self-assessments and report granting Neles (or a third party selected by Neles) access to relevant premises and information to conduct on-site audits, including interviewing relevant Supplier personnel and access to accurate and complete documentation and records.

Supplier shall cure any non-conformity identified without a delay.

Failure to comply with this Supplier Code of Conduct may have negative consequences. For example, Neles may suspend or terminate its contract with the Supplier.

In the event of potential misconduct, we encourage our suppliers to report to their Neles contact person, to Neles Speak Up reporting channel <https://neles.ethicspoint.com/>

**Supplier's approval**

Acknowledged and approved

Place:

Date:

Supplier name:

Signature:

Name of the signatory:

Supplier registration number: