NKT Code of Conduct for Vendors and Business Partners
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Our Values

Safety first
Have backbone, disagree and then commit
Embrace and drive change
Be passionate and determined
Forewords

NKT is a global frontline supplier to the energy sector. We develop, manufacture and market high quality cables, accessories and solutions for electrical infrastructure, the construction field and in the railway industries.

We supply creative, highly technological and sustainable products, services and solutions for our customers.

We take responsibility for our actions and comply with applicable laws, regulations and international requirements. Furthermore, we are a member of the UN Global compact.

This Code of Conduct reflects NKT internal Business Code of Conduct, applicable to all employees.

We expect and require our business partners to operate in full compliance with all applicable laws, regulations, international requirements and this Code of Conduct. NKT herewith requires its business partners to implement the principles described in this Code of Conduct in their own businesses or have at least equivalent standards adopted and conduct their business in accordance therewith. We require that our business partners request their business partners to do the same. Furthermore, we require that our vendors and business partners at any time are able to demonstrate and document compliance with this Code of Conduct and ensure adequate due diligence within its own business and on the source and chain of custody, and make their due diligence measures, etc., available upon request.

NKT reserves its rights to conduct announced audits at the vendor and business partners site in order to verify the compliance with this Code of Conduct. Any audits may be performed either by NKT employees or by a third-party auditor chosen by NKT.

NKT expressly reserves the rights to terminate any potential or existing business partner, if there is reluctance, unwillingness or failure to comply with this Code of Conduct.

Best regards,

Michael Lyng, President & CEO
“Be passionate and determined are our core values and conducting responsible business is in the heart of all our actions. We are committed to responsible and ethical behaviour and, as an active corporate citizen, we embrace a value-based approach to the way we conduct business around the world.”

We conduct our business responsibly and in compliance with the legal requirements and governmental regulations of the countries in which we operate and we request our vendors and business partners to ensure the following requirements:

**Anti-Corruption**
- Prohibit direct or indirect offering, promising, granting or authorizing the giving of money or anything else of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage for NKT.
- Ensure that any offer, promise, grant or gift made in connection with NKT business always complies with applicable laws and regulations, and never creates an appearance of bad faith or impropriety.

**Conflicts of Interest**
- Actively support and establish measures to ensure avoidance of conflicts of interests that may adversely influence the business relationships.

**Fair Competition**
- Always abide by the rules of fair competition, including ensuring not participating in any illegal price fixing, limitation of production, offers to share the markets with competitors, anti-competitive exchange of sensitive information with competitors and or abuse of a dominant market position.

**Financial Compliance**
- Comply with relevant legal, financial requirements, including but not limited to the UK Criminal Finances Act.

**Trade restrictions**
- Ensure that business is conducted in a manner not violating e.g. UN, EU, UK or US trade sanctions and inform NKT if made subject to international sanctions.
Confidentiality, Privacy & Intellectual Property Rights

"Security of all aspects of information must be ensured. We must also protect intellectual property and confidential business information belonging to both our company and external parties. The security of data has top priority and we must ensure adequate handling, security programs and measures”

These requirements also apply to our vendors and business partners and therefore the following must be ensured:

Confidentiality
- Information in relation to business activities, structure, financial situation and performance is to be disclosed only in accordance with applicable laws, regulations, industry practices and relevant agreements.

Privacy
- Protecting personal information in accordance with the privacy expectations employees and others doing business with us. Comply with all applicable privacy and security laws and regulations when personal information is collected, stored, processed, transmitted or shared.

Intellectual Property Rights
- Respect intellectual property rights of others, e.g. patents, trademarks, trade secrets, copyright and ensure to act within the limits of any licenses granted.
"We are committed to working towards a preservation of the environment through sustainable business processes. We will strive to reduce the consumption of resources and to limit the emission of pollutants from our business activities"
Human- & Labour Rights

"A safe and healthy working environment is a top priority in our company. We respect each employee’s integrity and always treat others with respect and decency”

We require that our vendors and business partners provide a safe and healthy working environment too, and ensure compliance with the following human- and labour rights:

**Health & Safety**

Ensuring:
- that workers are protected from over exposure to chemical, biological, physical hazards and physically demanding tasks in the workplace,
- the identification and assessment of emergency situations in the workplace, and minimizing their impact by implementing emergency plans and response procedures,
- to provide safety information relating to hazardous materials and ensure education, training and protection of workers from hazards.

**Forced Labour**

- Condemn any form of forced labour, including bonded labour, indentured labour, slave labour, and human trafficking. Ensure relevant due diligence and take adequate measures whenever necessary.

**Child Labour & Young Workers**

- No hiring of child labour. Persons between the age of 15 and 18 are allowed to work if permitted by local laws and if compulsory schooling has been completed. Young persons must not undertake dangerous work that may jeopardise their physical or mental health, nor may they work at night. They must also be given the right training and instruction to perform the relevant job.

**Non-discriminations**

- Ensure zero tolerance in relation to any form of discrimination based on factors such as, race, colour, gender, language, privacy, religion, ethnicity, political or other opinions, caste, national or social origin, property, birthplace, union affiliation, sexual orientation, health status, age, disability, or other distinguishing characteristics, in hiring and employment practices.

**Wages & Benefits**

- Pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. Further it must be ensured that employment conditions, including compensation, working hours, vacation time, leave periods and holidays are in compliance with applicable laws and regulations, including mandatory industry standards.

**Freedom of Association & Collective Bargaining**

- Recognize and respect the rights of employees to freely associate, organize and bargain collectively.

**Conflict Minerals**

- Ensure that all minerals, including but not limited to tantalum, tin, tungsten and gold, in the products produced or supplied do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in any country.
"With respect to the quality performance of our products, services and solutions, we must at all times monitor and improve our customers’ and markets’ perception of our performance. We must live up to our customers’ requirements and needs, as specified and agreed in product specifications and other arrangements."

NKT is in the scope of the Integrated Management System designed according to the requirements of OHSAS 18001, ISO 14001 and ISO 9001, ensuring the highest standards for our business. Supply of raw material of variable quality affects not only our internal process but can also affect the performance of the final product.

To ensure a consistent high quality level of our products, we also request our vendors and business partners to ensure the delivery of uniform high quality products and demonstrate and commit to the agreed quality standards and processes.
Whom to Contact

We always invite you to join us in a close dialogue about our standard to be able to work together on an extended and improved compliance level. Please contact SupplierCompliance@nkt.com for further information.

Also, your willingness to come forward and report unethical behaviour is important to NKT. Therefore, you are recommended to come forward with your concerns, also through our Whistleblower Hotline, which can be found at our homepage www.nkt.com.