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## Code of Conduct (CoC) and CSR Nordic Stream AB

The aim of this document is to be a transparent guideline for Nordic Stream AB, it's subsidiaries and upstream stakeholders (suppliers and their sub suppliers) to act in a consistent way in all process.

This CoC should be communicated to all stakeholders and employees.

The CoC is approved by Nordic Stream AB's board of directors.

Norrhult, Sweden 2024-02-22



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## 1 Human rights

Attention must be paid both to risks directly linked to the supplier's own activities and to risks linked to sub suppliers or other business relationships.

### 1.1 No forced, bonded, or compulsory labour

Suppliers must not permit forced, bonded, or indentured labour, involuntary or exploitative prison labour, slavery, or trafficking of persons. Suppliers, must not engage in or tolerate abuse of vulnerability, deception, restriction of movement, physical or sexual violence, intimidation and threats, withholding of wages, debt bondage, abusive working and living conditions, excessive overtime, or any other kind of exploitation or abuse. All work must be voluntary, and workers must be free to leave work at any time or terminate their employment without penalty according to worker's contract.

### 1.2 No child labour

Child labour must be prohibited and prevented. Suppliers shall take the appropriate measures to ensure that no child labour occurs at their own place of production or operations or at their sub-contractors' sites. Suppliers must under no circumstances employ individuals under the age of 15.

### 1.3 Freedom of association and collective bargaining

All workers, must have the right to lawfully form, join or not join labour unions, bargain collectively, seek representation and join workers' councils, in accordance with local law and international conventions. Workers' representatives shall not be discriminated and shall have access to carrying out their function of representation in the workplace.

### 1.4 Non-discrimination, diversity, and inclusion

There shall be no discrimination in hiring, compensation, access to training, promotion or termination of work based on ethnic background, religion, caste, age, disability, gender, marital status, pregnancy, sexual orientation, union membership or political affiliation.

All workers with the same experience and qualifications should receive equal pay for equal work. Workers should be protected from sexually intrusive, threatening, insulting or exploitative behavior, and from discrimination or termination of employment on unjustifiable grounds, e.g., marriage, pregnancy, parenthood, or HIV status. Suppliers should value and respect diversity, equity and inclusion. We also encourage our suppliers to support employment of disabled persons.

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## 1.5 Wages and benefits

Wages and social benefits shall meet national legal standards at a minimum. Wages should be enough to meet basic needs and provide some discretionary income. Social benefits shall at least be in accordance with national law. All workers shall be provided with a written contract of employment in a language they understand outlining their wage conditions and method of payments before entering employment. Deductions from wages as a disciplinary measure shall not be permitted.

## 1.6 Working hours and overtime

Workers shall be granted annual leave and sick leave, to which they are entitled according to national legislation, without any form of negative sanctions. In case of pregnancy, female workers shall be given maternity leave in accordance with the national legislation. Working hours, resting hours, overtime and breaks shall comply with national laws. Working hours must not exceed 48 hours per week and workers shall be provided with at least one day off for every 7-day period. Overtime shall be voluntary and limited. Workers shall receive overtime pay. The pay shall, as a minimum, be in accordance with requirements in applicable law.

## 1.7 Harassment, abuse, and inhumane treatment

Physical or mental abuse or punishment, or threats of physical or mental abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, shall be prohibited.

## 2 HEALTH AND SAFETY

### 2.1 Occupational health and safety

Suppliers must ensure that their workers' potential exposure to safety hazards such as those associated with electrical and structural integrity, machinery, chemicals, toxins, vehicles, fall hazards, and facility layout. Suppliers must provide well-maintained personal protective equipment at no cost. Suppliers must provide their workers safe and healthy working conditions, including potable drinking water, adequate sanitation, lighting, temperature, ventilation, and suitable facilities for women's health needs. Workers shall receive relevant and documented health and safety training in their primary language, and such training shall be repeated on a regular basis.

### 2.2 Occupational injury and illness

Suppliers must put in place procedures and systems to prevent, manage, track and report occupational injury and illness, provide necessary medical treatment, investigate cases, and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

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## 2.3 Emergency preparedness

Suppliers must identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures including emergency reporting, worker notification and evacuation procedures, worker training, drills, appropriate fire detection and suppression equipment, adequate exit facilities and first-aid supplies.

## 2.4 Housing conditions

Accommodation, where provided either by the supplier, a labour agent/agency, or other affiliate, shall be clean, safe, adequately ventilated and structurally maintained. Facilities should promote basic human rights dignity through access to potable water, sanitary food preparation areas, reasonable personal space, adequate heat and ventilation, clean and well-maintained bathrooms, and showers. All facilities must have clear and unrestricted exits.

## 2.5 Health and safety communication

Suppliers must ensure that workers receive appropriate workplace health and safety information, training, and warnings in the language of the worker or in a language the worker can understand for all identified workplace hazards they are exposed to. Training is provided prior to the beginning of work and regularly thereafter. Workers must be encouraged to raise any health and safety concerns without retaliation.

## 3 ENVIRONMENT

### 3.1 Hazardous substances

Suppliers must identify, label, and manage chemicals, waste and other materials posing a hazard to humans or the environment to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

### 3.2 Emissions

Suppliers must monitor, track, and document its emissions to air, water, and soil from its facilities, as well as the wastewater generated by its operations. All output must be monitored, tracked, and documented.

### 3.3 Greenhouse gas emissions

Suppliers are highly encouraged to set science-based greenhouse gas emission reduction targets as well as to measure the carbon footprint.

### 3.4 Resource efficiency

Suppliers must take appropriate steps and set targets to minimize the consumption of natural resources like materials, energy, and water, as well as put in place saving strategies for these resources.

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## 3.5 Waste management

Suppliers must implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste.

## 3.6 Environmental impact considerations

When designing, develop and suggest products, production as well as production process and materials, we shall always consider environmental impact under conditions that it can fulfill the business targets. When designing a product we should maximize the total recyclability after it's life time and minimize the amount of raw material needed.

Packaging material should be chosen for the best combination of protecting/waste/recyclability/space efficiency.

Production site should be chosen in an area with well developed supply chain to minimize transports.

When applicable, we should inform our customers of the environmental impacts of different choices.

## 3.7 Quality and environment

To produce products with the highest quality, we increase the usage time if the products and thereby reduce the environmental impact.

## 3.8 Measurement

We aim, in the future, to be able to fully measure our environmental impact concerning energy usage, emissions and other KPI:s in order to show our stakeholders of the environmental impact of our products.

## 4 Business integrity and ethics

### 4.1 Anti-corruption

Suppliers shall not tolerate and shall work against corruption in all its forms in the public and private sector. The supplier shall comply with applicable laws concerning bribery, corruption, fraud and any other prohibited business practices. The supplier shall not offer, promise, or give any improper benefit, favour, or incentive to any public official, international organization or other third party directly or indirectly.

### 4.2 Business courtesies, gifts, hospitality, and expenses

The supplier shall not, directly, or indirectly, offer gifts or cash to any employees or persons representing Nordic Stream AB or anyone closely related to these, unless the gift is of insignificant value and based on local traditions. Travel expenses for the individual representing Nordic Stream AB shall be paid for by Nordic Stream AB.

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## 4.3 Money laundering

Suppliers shall not take part in any form of money laundering and shall implement measures to prevent financial transactions from being used to launder money.

## 4.4 Fair competition

Suppliers must uphold fair business, advertising, and competition standards. The supplier shall under no circumstance cause or be part of any breach of general or special competition regulations and laws, such as illegal cooperation on pricing, illegal market sharing or other practice in violation of applicable competition laws.

## 5 Management practices

### 5.1 Accuracy and traceability

Suppliers are committed to transparency, verifiability, and accuracy in their dealings, while respecting their confidentiality obligations. All accounting information must be correct, registered, and recorded in accordance with laws and regulations. When the supplier uses sub-suppliers in connection with a delivery to Nordic Stream AB, all links shall be traceable concerning the manufacturing location with respect to any delivery to Nordic Stream AB. If requested by Nordic Stream AB, the first-tier supplier shall inform Nordic Stream AB about all second tier (in some cases also third tier) suppliers and their manufacturing locations.

### 5.2 Transparency

Suppliers shall, upon request, give full information of the supply chain that is used for production for products delivered to Nordic Stream AB. Nordic Stream AB should be fully entitled to, at any time and without restrictions, visit and evaluate all suppliers in the supply chain. Nordic Stream AB have the right to refuse to use any of the mentioned suppliers in the supply chain.

Nordic Stream AB are offering transparency of the supply chain to customers and other stakeholders upon request, with limitations for business secrets that cannot be revealed.

## 6 Compliance

### 6.1 Auditing and monitoring

To evaluate compliance with CoC, Nordic Stream AB mainly use 3<sup>rd</sup> party audits AMFORI/BSCI or any other well known 3<sup>rd</sup> party audit as well as conducting on-site audits of suppliers and their production sites. We reserve the right to monitor compliance by inspections, conducted by Nordic Stream AB staff or independent, third-party auditors. An auditor appointed by Nordic Stream AB shall, if requested by



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Nordic Stream AB, be given access to the records and to other information to verify such compliance.

## 6.2 Non-compliance and corrective actions

This CoC sets the standard expected to be met by all our suppliers throughout the value chain. If the requirements in this CoC are not met by a supplier, the parties will discuss corrective actions through an open dialogue. The supplier shall do its utmost to implement corrective actions as soon as possible, and it shall inform Nordic Stream AB about any such actions.

## 6.3 Boycott and sanctions

Nordic Stream AB follows applicable decided sanctions decided by UN and EU but not limited to these. Suppliers shall comply with the trade sanctions relevant for the engagement with Nordic Stream AB.

## 6.4 Whistle blowing

Contact information at suppliers should be published in an official method to make it possible for all stakeholders to contact Nordic Stream AB reporting violation of this policy and other abuses.

## 6.5 Others

References:

[UN's Global Compact's 10 principles](https://unglobalcompact.org/what-is-gc/mission/principles)

<https://unglobalcompact.org/what-is-gc/mission/principles>

[The Universal Declaration of Human Rights \(UN 1948\)](https://www.un.org/en/about-us/universal-declaration-of-human-rights)

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