Supplier Code of Conduct

Responsible business conduct for Nordec suppliers and partners

Nordec designs, manufactures and installs steel structures for demanding construction projects and provides structural frames and envelopes for diverse building types and infrastructure across Northern and Central Europe.

Our suppliers play a critical role in enabling safe execution, technical quality, reliable deliveries and sustainable performance. We expect suppliers to support our goals and values by operating safely, ethically and sustainably, and to meet the requirements of this Code.

Scope and compliance

This Supplier Code of Conduct sets the minimum standards Nordec expects from suppliers, subcontractors, manufacturers, consultants, labour providers, logistics partners and other business partners contributing to Nordec's operations or projects ("Suppliers"). The Code applies to all goods and services delivered to Nordec and to all Suppliers involved in Nordec's operations, projects or value chain and forms part of Nordec's supplier requirements.

By entering into a contract, accepting a purchase order, registering as a supplier, commencing work, delivering goods or services to Nordec, or otherwise conducting business with Nordec, the supplier acknowledges this Code and agrees to comply with it. Suppliers shall ensure that equivalent requirements are communicated, implemented and followed by their relevant sub-suppliers, subcontractors, labour providers and recruitment agencies and other parties throughout the value chain.

Suppliers shall comply with applicable laws, regulations, collective agreements, permit conditions and contractual requirements in the countries where they operate and where Nordec's products or services are designed, manufactured, delivered or installed and maintain a risk-based and documented approach to compliance and responsible business conduct.

Nordec expects suppliers to act with accountability and to communicate openly about issues that may affect compliance, safety, quality, schedule or trust.



Our commitment

Nordec is committed to conducting business in accordance with internationally recognised principles on human rights, labour rights, responsible business conduct and sustainability.

The commitments reflected in the Nordec Code of Conduct are based on frameworks including the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact, the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance.

This Supplier Code of Conduct incorporates the same principles and is aligned with the Nordec Code of Conduct and relevant legal and regulatory requirements and expectations, including the EU Corporate Sustainability Due Diligence Directive (CSDDD), REACH and CLP regulations, trade sanctions and export control rules, EU environmental and circularity legislation, EU General Data Protection Regulation (GDPR), and internationally recognised anti-corruption principles, including the United Nations Convention against Corruption.

Nordec is certified according to ISO 9001, ISO 14001 and ISO 45001. The requirements in this Supplier Code of Conduct are aligned with these standards.

Supplier Code of Conduct

Responsible business conduct for Nordec suppliers and partners

Business ethics

Nordec has zero tolerance for bribery, corruption, facilitation payments, fraud, embezzlement, false invoicing, undeclared labour, money laundering and other improper business practices.

Suppliers shall compete fairly and shall not engage in price fixing, bid rigging, market sharing, improper competitor information exchange or deceptive trade practices.

Suppliers shall not directly or indirectly through a third-party offer, request or accept improper benefits to win business, influence decisions or gain an unfair advantage.

The Supplier shall not use agents, consultants or intermediaries to do anything that would be prohibited if done directly. Suppliers shall maintain accurate and transparent books, records and business practices.

Suppliers shall avoid conflicts of interest and promptly disclose Nordec any close personal, family or financial relationship involving a Nordec employee or representative participating in supplier selection, supervision or evaluation.

Suppliers shall comply with applicable competition, customs, export control, trade sanctions, tax and other legal requirements, including EU, UK, US and UN requirements where relevant.

Suppliers shall not directly or indirectly supply goods, services, technology or information to Nordec in breach of trade compliance requirements or in connection with sanctioned parties, countries, prohibited end-users or prohibited end-uses.

Suppliers shall obtain required licences, permits or approvals and support Nordec with compliance information upon request.

Gifts and hospitality must be lawful, modest, transparent and infrequent, and shall never be offered, requested or accepted for the purpose of obtaining or retaining business or securing any improper advantage. Cash, cash equivalents, gift cards and vouchers are prohibited.

Key requirements

- Conduct Nordec-related business with integrity, transparency and legal compliance
- Do not engage in corruption, fraud, unfair competition or trade compliance breaches
- Avoid conflicts of interest
- Keep accurate records



Human rights

Suppliers shall respect internationally recognised human rights in their operations and relevant supply chains.

Suppliers shall identify and assess actual and potential adverse human-rights impacts, take action to prevent them and mitigate risks, monitor the effectiveness and provide relevant information to Nordec upon request.

Suppliers shall give particular attention to higher-risk workers and situations in Nordec's construction and steel value chain, including migrant workers, posted workers, temporary agency workers, subcontracted labour, labour providers, workers in high-risk countries or sectors.

Suppliers shall provide easy access and safe process for workers and other affected people to raise human rights concerns. Grievance mechanisms such as whistleblowing channels, complaint procedures or worker reporting channels shall be accessible, confidential where needed, known to workers, protected from retaliation, and supported by processes for investigation, resolution and follow-up. Suppliers shall cooperate with Nordec in remediation where adverse impacts connected with deliveries to Nordec are identified.

Suppliers shall flow down equivalent human rights requirements to relevant suppliers, subcontractors, labour providers and recruitment agencies.

Suppliers shall conduct risk-based checks in their own supply chains, verify compliance in higher-risk arrangements, support Nordec's due diligence and customer requirements, and cooperate in remediation if impacts are identified.

Key requirements

- Respect human rights
- Proactively identify and manage risks
- Protect vulnerable workers
- Provide safe reporting channels
- Pass on these requirements
- Take action to minimize impacts

Supplier Code of Conduct

Responsible business conduct for Nordec suppliers and partners

Labour practices

Suppliers shall provide lawful, decent and fair working conditions for everyone working on goods or services for Nordec.

Forced labour, bonded labour, compulsory labour, prison labour used in breach of law, trafficked labour and other forms of modern slavery are prohibited.

Work shall be voluntary, workers' identity documents and personal belongings shall not be withheld, and workers shall be free to leave employment in accordance with lawful notice requirements without unlawful charges or financial sanctions.

Workers shall not pay recruitment fees or similar charges, directly or through labour providers, recruitment agencies or other third parties. If such fees have been paid, suppliers shall reimburse the worker.

Suppliers shall apply special controls for migrant workers, posted workers, temporary agency workers, subcontracted labour and labour providers, including clear contracts, lawful recruitment, transparent wage payment and access to grievance channels.

No person below the minimum legal working age may be employed, and work by children under 15 is never permitted. Suppliers shall comply with applicable minimum age requirements and give additional protection to workers under 18. Young workers shall not perform hazardous work, night work, excessive overtime or other work that may harm their health, safety or development.

Suppliers shall provide workers with clear written employment terms in a language they understand, including the nature of work, wages, working hours, overtime arrangements, notice periods and other key employment conditions.

Working time, overtime, rest periods, wages, benefits and leave shall be recorded and comply with applicable law and collective agreements. Wages shall be paid on time, wage statements shall be clear, showing gross pay, overtime, additions, lawful deductions and net pay, and wage deductions shall not be used as a disciplinary measure.

Workers shall be treated with dignity and respect. Suppliers shall provide equal treatment and opportunities and shall not discriminate in recruitment, pay, promotion, training, termination or other employment decisions.



Harassment, bullying, intimidation and retaliation are prohibited. Workers who raise concerns, participate in investigations or exercise lawful rights shall be protected from retaliation.

Suppliers shall respect workers' rights to freedom of association and collective bargaining in accordance with local law. Workers shall be free to form or join trade unions and to choose worker representatives without intimidation or retaliation. Where local law restricts union activity, suppliers shall not obstruct lawful alternative forms of worker representation or dialogue.

If supplier-provided accommodation is used, it shall be safe, clean and suitable, with proper sanitation, drinking water, food preparation and eating facilities, privacy, heating, ventilation, lighting, hot water and emergency exits. Accommodation shall not be used to restrict workers' freedom of movement or access to their personal documents.

Upon request or during an audit, suppliers shall provide Nordec with employee lists showing roles and employment status, working time records, and documents demonstrating compliance with wage, benefit and working time obligations, including timely wage payment and overtime compensation where applicable.

Key requirements

- Provide fair, lawful and safe working conditions
- Prohibit forced labour, child labour and worker-paid recruitment fees
- Protect workers from discrimination, harassment and retaliation
- Respect freedom of association, ensure clear employment terms, proper wages and suitable accommodation where provided

Supplier Code of Conduct

Responsible business conduct for Nordec suppliers and partners

Health and safety

Nordec is committed to a strong safety culture, zero accidents and preventing work-related injury and ill health. Suppliers shall provide safe and healthy working conditions and manage health and safety systematically and proportionately to their activities, risks and role in Nordec's value chain.

Suppliers shall maintain a structured occupational health and safety approach aligned with ISO 45001 or equivalent, including clear responsibilities, leadership commitment, resources, legal compliance, objectives, operational controls, monitoring, corrective actions and continual improvement.

Suppliers shall identify hazards and assess risks before work begins and when work, materials, equipment, workplaces or conditions change. Risks shall be controlled using the hierarchy of controls: eliminate, substitute, apply engineering and organisational controls, use safe procedures, and provide suitable personal protective equipment free of charge where required.

Suppliers shall ensure workers, supervisors and others under their control are competent and understand relevant health and safety requirements through induction, task-specific instructions, training, hazard and control communication, and risk-based supervision.

For work on Nordec or client-controlled sites, suppliers shall complete required inductions, follow site rules and permits, and implement task-specific risk assessments, method statements and permits for high-risk work, including work at height, lifting, hot work and traffic-related activities.

Suppliers shall consult workers and support participation in health and safety matters, including hazard identification, risk assessment, improvements, safety observations and incident learning. Workers shall be encouraged to report hazards, near misses and unsafe conditions without retaliation and shall have authority to stop unsafe work.

Tools, machinery, vehicles, lifting equipment, workplaces and other work equipment shall be safe, suitable, inspected, maintained and used only by competent persons.

Suppliers shall maintain emergency preparedness and response arrangements, including first aid, fire safety, evacuation, rescue, emergency communication and drills or testing where relevant.

Suppliers shall control chemical, physical, ergonomic, biological and psychosocial hazards where relevant, adapt work to protect physical and mental health, prevent occupational illness, manage fatigue, support a respectful workplace, and control alcohol, drugs and other impairment risks.

Suppliers shall provide legally required occupational health services and ensure workers are covered by applicable occupational accident insurance.

Suppliers shall maintain records demonstrating health and safety compliance and effective controls, including risk assessments, training, permits or licences, inspections, maintenance records, incident investigations and corrective actions, and provide them to Nordec upon request.

Suppliers shall record and investigate work-related incidents, injuries, illnesses, near misses and unsafe conditions, take corrective actions to prevent recurrence, and report without delay any incident, serious near miss, dangerous occurrence or unsafe condition on Nordec or client-controlled sites, or elsewhere if it may affect Nordec people, projects, deliveries or reputation.

Suppliers shall cooperate fully in subsequent investigations and retain relevant safety incident statements, records and data sheets.

Key requirements

- Provide safe and healthy working conditions
- Identify and manage risks, use competent workers and safe equipment
- Involve workers
- Be ready for emergencies
- Report and fix hazards and incidents without delay



Supplier Code of Conduct

Responsible business conduct for Nordec suppliers and partners



Chemical safety

Nordec works systematically to reduce chemical risks to people and the environment. Suppliers shall apply a practical, risk-based approach when chemicals are supplied to or used in work for Nordec.

Suppliers shall comply with applicable chemical legislation, including REACH where relevant, and provide Nordec with information needed for safe use, product compliance, environmental protection and customer requirements. This includes information on restricted substances or substances of very high concern in deliveries to Nordec.

Suppliers that supply or use hazardous substances shall keep an up-to-date chemical inventory and maintain current safety data sheets where required. Relevant information shall be available to workers who handle or may be exposed to chemicals, and chemicals shall be labelled, stored, handled and transported safely. Suppliers shall maintain lawful permits where required.

Chemical hazards and risks shall be identified and assessed before use and when relevant changes occur. Suppliers shall minimise hazardous substances, prioritise safer alternatives and control remaining risks through suitable technical and organisational measures, safe work procedures, training and personal protective equipment where needed.

Suppliers shall maintain appropriate preparedness for chemical incidents affecting worker safety, including exposure response, fire risk and emergency communication where relevant.

Suppliers shall maintain records appropriate to their chemical risks and provide relevant evidence of compliance to Nordec upon request.

Key requirements

- Manage chemicals safely and legally
- Identify chemical hazards, keep chemical information and safety data sheets available
- Label, store and handle chemicals safely
- Reduce hazardous substances where possible
- Control exposure risks and prepare for incidents

Environment

Nordec is committed to protecting the environment, preventing pollution and using resources responsibly. Suppliers shall support these objectives in their work for Nordec and comply with applicable environmental laws, permits, reporting requirements, Nordec requirements and project-specific obligations.

Suppliers shall maintain a structured environmental management approach aligned with ISO 14001 or equivalent, reduce negative environmental impacts and improve performance. This includes reducing emissions and pollution, improving energy and material efficiency, and maintaining targets and action plans to reduce carbon footprint, fossil fuel use and energy consumption.

Suppliers shall minimise waste generation and promote reuse, recycling and other forms of resource recovery. Waste shall be segregated, handled, stored, transported and disposed of in accordance with applicable legal requirements and permit conditions. Hazardous waste shall be identified, labelled, stored separately and managed by authorised contractors.

Suppliers should propose low-carbon alternatives where available and provide Environmental Product Declarations (EPDs) when applicable, available or required. If an EPD is not available, suppliers shall provide a plan to develop it where relevant. For services such as transport and crane services, suppliers shall provide relevant fuel and energy use information.

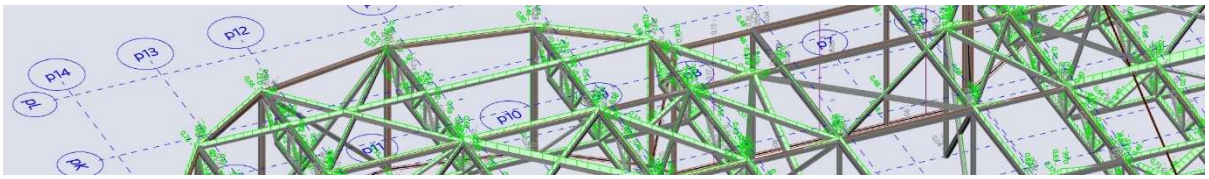
Suppliers shall prepare for environmental incidents, such as spills or releases, and report without delay incidents that occur on Nordec or client-controlled sites or may affect Nordec people, projects, deliveries or reputation.

Key requirements

- Support Nordec's environmental goals
- Identify and manage environmental impacts systematically
- Use resources responsibly
- Measure and minimize greenhouse gas emissions
- Support circular solutions

Supplier Code of Conduct

Responsible business conduct for Nordec suppliers and partners



Delivery conformity

Nordec requires reliable deliveries with proper technical quality and systematic quality management. Suppliers shall deliver goods, services and documentation that meet agreed requirements and contribute to safe, compliant and predictable execution.

Suppliers shall maintain a structured quality management approach, aligned with ISO 9001 or equivalent where relevant, including responsibilities, process controls, competence, documented information, monitoring, nonconformity handling and continual improvement appropriate to their delivery.

Suppliers shall meet applicable contractual, technical, regulatory and product safety requirements, and provide the conformity evidence, traceability information and technical or digital product data needed to verify compliance. Required data shall be accurate, complete and up to date.

Deliveries to Nordec shall meet agreed requirements and specifications, documentation, identification, and schedule. Suppliers shall notify Nordec without delay of any deviation, failed test, non-conforming material, missing documentation, delay risk or other issue that may affect safety, quality, installation, compliance or project performance.

Suppliers shall not make changes to agreed materials, products, production methods or service delivery without Nordec's prior approval where the change may affect safety, performance, durability, certification, compliance, appearance, schedule or lifecycle performance.

Suppliers are expected to support reliable and well-documented deliveries, cooperate constructively with Nordec and contribute to corrective and preventive actions where issues arise.

Key requirements

- Manage quality in a clear & systematic way
- Deliver goods, services and documents that meet requirements
- Keep records, report issues early, and do not make unapproved changes

Information protection

Suppliers shall protect confidential information, trade secrets, intellectual property, personal data and digital assets. Access shall be limited to authorised persons with a legitimate need, used only for authorised purposes, and confidentiality obligations shall continue after the contractual relationship ends.

Suppliers shall apply appropriate technical and organisational measures to protect information received from or relating to Nordec, its customers, employees, suppliers and other stakeholders.

When processing personal data for Nordec, suppliers shall comply with applicable data protection laws, including the EU GDPR. GDPR-covered personal data shall be stored and processed in the EU/EEA, and any transfer, storage or processing outside the EU/EEA, or other exception, requires Nordec's prior approval.

Devices, systems, networks and external services used for Nordec business shall be adequately secured and controlled. Nordec information shall not be moved to unauthorised devices, systems or external services.

Public or external AI tools shall not be used for Nordec-related confidential, personal or business-sensitive information unless Nordec has approved such in writing. Any transfer or use of technology, know-how or technical information shall protect Nordec's and third parties' intellectual property, trade secrets and confidential information.

Suppliers shall ensure relevant personnel and business partners know the information security requirements. Data breaches, cybersecurity incidents and confidentiality breaches that may affect Nordec shall be reported without undue delay, and suppliers shall cooperate in investigation and resolution.

Key requirements

- Protect Nordec information, personal data, intellectual property and digital assets
- Use secure systems and access controls
- Do not use public AI tools for confidential Nordec information without Nordec's written approval

Supplier Code of Conduct

Responsible business conduct for Nordec suppliers and partners



Supply chain due diligence

Nordec expects responsibility and compliance to continue through the supply chain. Suppliers shall pass equivalent requirements to relevant suppliers, service providers and other parties involved in deliveries to Nordec.

Suppliers shall conduct risk-based due diligence to identify, assess, prevent, mitigate and address actual and potential adverse human rights and environmental impacts arising from their operations and relevant supply chains. Where risks or impacts are identified, suppliers shall take appropriate actions, monitor effectiveness, and maintain appropriate policies, procedures and records.

For higher-risk materials, commodities or sourcing arrangements, suppliers shall apply recognised responsible sourcing practices and support Nordec's due diligence when requested. This may include mapping the supply chain from raw material or input to the finished product or service, and providing origin, chain-of-custody and control evidence such as certificates, purchase orders, bills of lading, payment records or other relevant documentation.

Suppliers shall ensure compliance in relevant supply chains, remain responsible for breaches connected with deliveries to Nordec, and cooperate transparently to address higher-risk issues early.

Suppliers shall ensure that Nordec, or a third party acting on Nordec's behalf, may conduct an audit of relevant parts of the supplier's supply chain. Upon reasonable request, suppliers shall facilitate access to relevant documentation, facilities, personnel and subcontractors involved in deliveries to Nordec, subject to applicable confidentiality and legal restrictions.

Key requirements

- Pass the requirements to suppliers and subcontractors
- Identify and manage human rights and environmental risks in the supply chain
- Act responsibly in case of breaches connected with deliveries to Nordec
- Support audits and provide origin and control evidence when requested

Reporting and breaches

Suppliers shall provide safe and accessible ways for their personnel to report actual or suspected breaches of this Code, illegal activity or other wrongdoing. Retaliation against anyone who raises a concern in good faith is prohibited.

Concerns related to Nordec projects shall be raised with the designated Nordec key contact, such as the relevant project manager or sourcing representative. Where appropriate, concerns may also be reported anonymously through Nordec's whistleblowing channel.

Nordec may verify compliance of suppliers and their supply chain through supplier assessments, document reviews, meetings, audits, site visits, factory visits or project follow-up. Suppliers shall cooperate openly and provide requested information on time.

If a supplier breaches this Code, Nordec may require immediate corrective action and take measures including closer follow-up, replacement of personnel, suspension or stoppage of work or deliveries, withholding of payments, rejection of products, removal from site, cancellation of orders, claims for damages, reporting to authorities or termination of the business relationship.

Serious breaches include among others forced labour, child labour, severe safety neglect, corruption, falsified records, refusal to provide relevant information, unauthorised substitution of critical materials, serious misuse of confidential information or personal data, and repeated failure to correct non-compliance. Serious breaches may result in immediate contract termination. The supplier shall indemnify and hold Nordec harmless against third-party claims arising from the breach.

Key requirements

- Provide safe reporting channels
- Protect good-faith reporting from retaliation
- Cooperate with Nordec verification activities, correct non-compliance promptly, and understand that serious or repeated breaches may lead to contractual consequences.

Supplier Code of Conduct

Responsible business conduct for Nordec suppliers and partners

Governance and document hierarchy

This Code of Conduct is issued by Nordec Group and approved by the CEO of Nordec Group. The code replaces the earlier Nordec Supplier sustainability policy and is reviewed yearly by the Management Team and Board of Directors.

The Code applies from its publication date and forms part of Nordec's supplier requirements.

Nordec's supplier requirements are structured in a hierarchy to ensure that expectations are clear, consistent and proportionate to the type of supplier relationship, delivery and risk.

The Nordec Code of Conduct sets Nordec's overall principles and commitments for responsible business conduct. This Supplier Code of Conduct translates those principles into minimum requirements for all suppliers, subcontractors and business partners delivering goods or services to Nordec.

More detailed supplier requirements apply to specific categories or types of goods and services depending on the delivery scope, risk level and contractual obligations.

Templates and records are used to support implementation, verification and traceability, including declarations, questionnaires, audit records, certificates, corrective action plans and other evidence of compliance.

In case of inconsistency, stricter requirements apply. Legal and contractual requirements always prevail where they impose higher or more specific obligations.

Document owner: Head of Sourcing
Date of application: 17th November 2026
Approved by: Kalle Luoto, CEO, Nordec Group
Version: 1.0

Building responsible partnerships

Our suppliers are an important part of Nordec's ability to deliver safe, responsible and high-performing operations. The requirements in this Code form a foundation for trust, good cooperation and long-term value creation.

By working openly, raising expectations together and supporting each other in daily operations, we can manage risks early, strengthen responsible business practices and deliver projects with quality, safety and integrity.

I believe that strong partnerships are built through transparency, accountability and shared commitment. Together with our suppliers, we will continue to push forward, building safer, smarter and more sustainable solutions with real impact.

Kalle Luoto
CEO, Nordec Group



