

supplier code of conduct

Introduction

atNorth is committed to responsible and sustainable business practices. atNorth complies with all legal requirements for the areas in which the company operates and ensures its suppliers adhere to the same standards of safe working conditions, fair treatment of employees and ethical and sustainable business practices.

We aim to mitigate all potential risks and the consequences thereof with atNorth's actions, as well as those linked to the company through business partnerships. We are committed to identifying and managing the impact of the risks, including those within our supply chain. As a result, we structure our procurement practices to optimize terms and conditions while ensuring that we do not harm people, society, or the environment through any of our business practices or within our supply chain.

atNorth's supplier Code of Conduct establishes guidelines aims to prevent any detrimental effects or risks to people, society, and the environment across our business operations. The atNorth Supplier Code of Conduct requires all our partners to adhere to the guidelines throughout all work undertaken together with atNorth.

This version of atNorth's Supplier Code of Conduct was adopted in November 2023.

Applying the Supplier Code of Conduct

atNorth's commitment

atNorth is dedicated to operating in a sustainable, ethical, and responsible manner, while adhering to all relevant legal obligations in the locations where the company operates.

atNorth follows policies that aligns with pertinent international conventions and guidelines established by organizations like the United Nations (UN), International Labor Organization (ILO), and the Organization for Economic Co-operation and Development (OECD).

atNorth places an emphasis on extending this commitment to its partners and supply chain. The Supplier Code of Conduct encapsulates the fundamental sustainability, safe working conditions and fair treatment of employees and integrity criteria that suppliers are obligated to observe. The Supplier Code of Conduct should be considered alongside specific contractual agreements entered into with suppliers, which may include additional requirements and guidelines pertaining to sustainability and business integrity matters covered by the Supplier Code of Conduct.

Scope of the Supplier Code of Conduct

All atNorth suppliers ("Suppliers") must comply with the atNorth Supplier Code of Conduct.

atNorth suppliers include all entities that provide goods or services, whether to or on behalf of atNorth. This includes all Suppliers that are:

- Manufacturing atNorth parts, components, subassemblies, and materials, or are involved in processes related to that manufacturing; and
- Providing services to or on behalf of atNorth, regardless of where the service is being performed, including but not limited to a Supplier's site, an atNorth site, or a customer's site.

Applicable laws and regulations

While we acknowledge the diverse and cultural contexts within which Suppliers operate globally, the atNorth Supplier Code of Conduct (referred as the "atNorth Code" or this Code) establishes the minimum standards that all atNorth Suppliers must adhere to throughout the contracted period.

The atNorth Code is a total supply chain requirement. The requirements of the atNorth Code apply to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Fundamental to the atNorth Code is the understanding that a business, in all its activities, must operate in full compliance with the laws, rules, and regulations of the countries in which it operates.¹ Furthermore, the atNorth Code encourages Suppliers to comply with all legal guidelines and regulation by embracing internationally recognized standards to promote social and environmental responsibility as well as ethical business practices.

As a Nordic entity, atNorth complies with applicable Nordic laws and regulations. When developing our policies, atNorth also takes guidance from international guidelines, including the United Nations and the Organization for Economic Co-operation and Development (OECD).

Where differences exist between applicable laws, regulations and atNorth policies, atNorth follow the highest standard.

atNorth respects human rights as defined by the United Nations Universal Declaration of Human Rights (UDHR) and The International Bill of Human Rights. We respect the rights of vulnerable groups (including migrants, children, and women) and all individuals in accordance with the core ILO conventions² and the Convention on the Rights of the Child.³

atNorth expects our suppliers to also uphold these same standards. We commit to the United Nations Guiding Principles on Business and Human Rights (UNGPs). Suppliers should uphold and respect human rights and be guided by best practice set out in the UNGPs.

The principles of the atNorth Code of Conduct

- We follow the laws of the countries where we do business and adhere to atNorth's policies and procedures.
- We personally set the example for each other and our stakeholders by being respectful, honest, and fair.
- We promote a culture of integrity through mutual respect, trust in each other and high standards of ethics in all our business dealings.
- We hold each other accountable to this Code, and if we become aware of potential violations, we promptly report them.

Compliance and management

Suppliers are expected to recognize and adhere to the stipulation outlined in the atNorth Code. This entails the establishment and effective dissemination and enforcement of suitable policies, protocols, management system, quality enhancement initiatives and internal control and audit mechanisms, as well as the requisite human resources to ensure adherence to the atNorth Code.

Engaging in a sustainable, ethical, and accountable manner

Suppliers shall conduct their operations with honesty and in a manner that is environmentally and socially sustainable, aligning with the principles of the atNorth's Supplier Code of Conduct. Suppliers shall aim to initiate regular and transparent conversations about sustainability matters with impacted groups and other relevant stakeholders.

1. Protect the environment

Suppliers shall consider and preferably monitor the climate impact of their operations and work towards lowering the greenhouse gas emissions from their activities, services, and products.

All required environmental permits (e.g., discharge monitoring), approvals, and registrations should be obtained, maintained, and kept current, and their operational and reporting requirements should be followed.

Suppliers shall minimize their total environmental impact and conduct risk assessments and risk management for precautionary approach. Suppliers (appropriate to the complexity and size) shall be able to demonstrate environmental policies and management systems sufficient to ensure continuous improvement in environmental performance.

Suppliers should implement a systematic approach to enter the circular economy to reduce waste formation from their operation.

1.1 Pollution prevention

Emissions and discharges of pollutants and generation of waste of all types should be minimized or eliminated at the source or by practices such as adding pollution control equipment.

Materials that pose a hazard to humans, or the environment should be identified, labeled, and managed to ensure their safe handling throughout the entire process through all the way to reuse, recycling or disposal.

Solid waste generated from operations should be characterized and treated as required prior to disposal.

Air emissions of volatile organic chemicals (VOC), aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations should be characterized, routinely monitored, controlled, and treated as required prior to discharge.

Suppliers should conduct routine monitoring of the performance of its air emission control systems if their equipment is releasing any form of Ozon depleting substances.

1.2. Materials restrictions

Suppliers should adhere to all applicable laws, regulations, and atNorth requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

1.3 Energy consumption, water management and Greenhouse Gas (GHG) emissions

Suppliers should look for methods to improve energy efficiency in their operations and to minimize their energy consumption and greenhouse gas emissions.

Suppliers should seek opportunities to conserve water and make sure all wastewater is treated as required by law prior to discharge or disposal. Suppliers should implement a systematic approach to prevent contamination of storm water runoff.

As appropriate to size and complexity, suppliers should establish a corporate-wide greenhouse gas reduction goal and all relevant Scopes 1, and 2 and 3 greenhouse gas emissions should be documented or publicly reported according to the Greenhouse Gas Protocol.

2. Respect for human rights and freely chosen employment

Suppliers shall respect internationally proclaimed human rights and freely chosen employment.

All forms of forced labor are prohibited, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking.

Workers should have freedom of movement within facilities and the right to choose their accommodation. Suppliers are responsible for providing all employees with written employment agreements that clearly outline the terms and conditions of their employment, before leaving their home country, with no changes allowed unless required by local law and providing equal or better term. These agreements should be presented in a language understandable to the employee.

Work must be voluntary, and workers should be free to leave without penalty, receive payment according to their contract, and retain their personal documents.

Employers can only hold documents if required by law, and any such cases must ensure workers' access to their assets. Workers should not be charged recruitment fees, and suppliers must repay any fees charged during the recruitment process.

2.1 Human rights due diligence

Suppliers must conduct human rights due diligence in accordance with the United Nations Guiding Principles on Business and Human Rights.

atNorth reserves the right to request documentation from suppliers regarding their actions to address identified actual and potential adverse impacts in their human rights' due diligence, within the constraints of applicable laws such as competition laws, personal data protection laws, and legal privilege.

This requirement encompasses both general information about the supplier's approach to and the outcomes of human rights due diligence, as well as information pertaining to specific products or services provided to atNorth by the supplier

2.2 Emergency preparedness

Potential emergency situations and events should be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training, and drills.

Emergency drills must be executed at least annually or as required by local law. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans.

2.3 Labor conditions

Suppliers should compensate their workforce in line with the national legal minimum wage standards (see the Global Living Wage Coalition). atNorth is committed to paying a living wage to its employees and encourages its suppliers to do the same.

Wages shall be paid directly to the workers (in the form of cash or cheques or into a nominated bank account), at the agreed intervals and in full. Suppliers must not employ wage deductions as a form of discipline and should provide employees with wage statements detailing their hours worked during the pay period. All disciplinary measures should be recorded.

Suppliers must ensure that working hours are reasonable and comply with local labor laws where they operate, as well as international requirements specified in the ILO Declaration on Fundamental Principles and Rights at Work and the ILO core conventions.

Working hours must comply with national laws and industry standards.

2.3 Child labor, modern slavery, and forced labor

Suppliers must not utilize forced or compulsory labor and should not impose restrictions on the movement of their employees. Workers should choose their employment freely without coercion or threats.

Child labor is strictly prohibited. Suppliers must comply with all national and local child labor laws or follow ILO core convention (whichever is higher). Children under the age of 15 (or the higher age mandated by applicable laws) should not be employed, except for permissible light work or training as outlined in the ILO Minimum Age Convention (C138). Suppliers should not, under any circumstances, let children under 18 be involved in work that endangers their health, safety, or development.

Suppliers should not withhold money or important documents, such as passports or identification papers, as conditions of employment. All employees should have the freedom to resign after providing appropriate notice, without any obligation or penalty.

2.4 Right to collective bargaining and freedom of association

Employees, without distinction, have the right to join or form trade unions or other comparable, legal organizations of their own choosing and to collectively make representations to, or enter negotiations over employment issues with their employer.

The supplier should engage in bargaining with employee representatives in a fair and honest manner. Discrimination against employee representatives or members of trade unions is prohibited, and these representatives should have access to perform their representative duties within the workplace.

In cases where national laws impose restrictions on the right to freedom of association and collective bargaining, suppliers shall allow employees to independently elect their own representatives.

2.5 Equality and diversity

Suppliers are encouraged to foster a working environment that embodies equality, diversity, and mutual respect, providing everyone with the chance to contribute to business success and fulfill their potential. When selecting and interacting with employees or individuals involved in contractual obligations with atNorth, suppliers must ensure there is no discrimination based on gender, race, religion, age, disability, sexual orientation, nationality, social or ethnic origin, political opinion, union membership, or any other characteristic.

Suppliers shall prohibit any form of discrimination or harassment in all their workplaces and inform their employees about the policies and procedures supporting the non-discrimination workplace.

2.6 Responsible sourcing of minerals

Suppliers should adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold ("3TG") in the products, parts, components, and materials they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance") or an equivalent and recognized due diligence framework. Suppliers are also required to inform atNorth immediately if they identify certain high risks included in Annex II of the OECD Guidance (including, but not limited to conflict or human rights risks associated with 3TG).

3. Safe workplace

3.1 Health and safety

A safe and hygienic working environment shall be provided. Suppliers must follow the ILO Conventions on Occupational Health and Safety any specific hazards and legal requirements in line with internationally recognized certification and standards such as ISO 45001.

Procedures and systems should be in place to prevent, manage, track, and report occupational injury and illness. Those procedures should:

- a) encourage worker reporting;
- b) classify and record injury and illness cases;
- c) provide necessary medical treatment;
- d) investigate cases and implement corrective actions to eliminate their causes; and
- e) facilitate the return of workers to work.

Health and safety incidents (accidents and injuries) should be maintained and documented with an action plan to improve performance by minimizing the causes of hazards in the working environment, preferably aiming for a goal of zero injuries within the workplace.

Employees are provided with health and safety training in the primary language of the worker or in a language that the worker understands. Supplier makes sure all its facilities undergo a safety risk assessment and have all required documentation and permits regarding structural, fire safety and electricity.

Workers should be encouraged to raise any health and safety concerns without retaliation.

3.2 Drugs, alcohol, and other intoxicating substances

While working for atNorth, suppliers are not allowed to be under the influence of drugs, alcohol, or any other intoxicating substance.

3.3 Physically demanding work, hygiene, and machine safeguarding

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls.

Workers should be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier should be maintained to be clean and safe, and provided with appropriate emergency egress.

Production and other machinery should be evaluated for safety hazards. Physical guards, interlocks, and barriers should be provided and properly maintained where machinery presents an injury hazard to workers.

Workers shall be provided with personal protective equipment gear free of charge.

4. Business integrity

The highest standards of integrity should be upheld in all business interactions. Suppliers should have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement. All business dealings should be transparently performed and accurately reflected on Supplier's business book and records. Monitoring and enforcement procedures should be implemented to ensure compliance with anti-corruption laws including but not limited to the United Kingdom Bribery Act and the United States Foreign Corrupt Practices Act. Suppliers should conduct appropriate risk-based diligence prior to engaging contractors or third parties to ensure that such third parties comply with the atNorth Code and the anti-corruption laws. Suppliers are also responsible for ensuring that any third party with whom they engage agrees to abide by business integrity standards that are no less stringent than the provisions of this Code.

4.1 Anti-corruption and anti-money laundering

atNorth must be informed of any serious breaches of compliance or investigations by authorities into potential breaches. Monitoring, record keeping, and enforcement procedures should be implemented to ensure compliance with anti-corruption laws.

Suppliers are required to oppose and actively combat corruption, in both public and private sectors where they operate. They must not engage in or condone the offering, solicitation, provision, acceptance, or receipt of bribes or any other improper benefits for business or personal gain, including facilitation payments, whether done directly or indirectly, on their own behalf or on behalf of others.

Suppliers shall not participate or take any part in money laundering and must have implemented measures to prevent any financial transaction from being used for money laundering purposes.

4.2 Accuracy of records

All business dealings should be transparently performed and accurately reflected on the Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable laws, regulations, and prevailing industry practices. Falsification of records and / or misrepresentation of conditions or practices in the supply chain are unacceptable.

4.3 Sanctions

Suppliers shall not have a business relationship or any other relationship with the sanctioned country, company, group, organization, or individuals.

4.4 Fair competition, advertising, and business

Standards of fair business, advertising and competition should be upheld. Appropriate means to safeguard customer information must be available and used.

4.5 Disclosure of information

All business dealings should be transparently performed and accurately reflected on the Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable laws, regulations, and prevailing industry practices. Falsification of records and / or misrepresentation of conditions or practices in the supply chain are unacceptable.

4.6 Intellectual property

Intellectual property rights should be respected; and the transfer of technological experience and know-how is to be done in a manner that protects intellectual property rights. Additionally, all customer and supplier information must be safeguarded. =

4.7 Protection of identity and non-retaliation

Programs that ensure the confidentiality, anonymity and protection of Supplier and employee whistleblowers should be maintained, unless prohibited by law. Suppliers should have a communication process for their personnel and workers to be able to raise any concerns without fear of retaliation.



4.8 Privacy

Suppliers are committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers should comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

4.9 Conflicts of interest

A conflict of interest arises when a representative of a supplier seeks to advance their personal interests, or those of a friend or family member, because of their role as a representative of the supplier. Suppliers must avoid all conflicts of interest while conducting business with atNorth. Suppliers are obligated to promptly report any situations that may present potential or apparent conflicts between their personal interests and the interests of atNorth.

4.10 Purchase of sexual service

atNorth supports the prohibition of purchase of sexual services and this policy is set to maintain a professional and ethical standard of conduct for all atNorth employees and contractors and any individual representing the company on business trips.

Violating this policy can result in disciplinary actions, including job termination.

Managing breaches and the cases of the Supplier Code of Conduct

1. Contact person for advice regarding the Supplier Code of Conduct

If suppliers have any uncertainty regarding any chapters or aspect of the Supplier Code of Conduct or are unsure about the correct actions to take in accordance with it, they should promptly seek guidance and discuss the matter with atNorth.

2. Adherence and management of the Supplier Code of Conduct or Concerns

Suppliers are expected to establish an internal mechanism for reporting and handling concerns and breaches of the Supplier Code of Conduct. Suppliers shall inform atNorth of any concerns or potential breaches and fully cooperate with atNorth's investigation of the matter.

Suppliers shall refrain from taking retaliatory actions against individuals who report or assist in addressing genuine sustainability and business integrity concerns.

Suppliers can report concerns anonymously through the whistleblowing channel on atNorth's external webpage or via whistleblowing@atnorth.com.

3. Infringements of the Supplier Code

Infringements of the supplier code of conduct are considered a significant issue, and the consequences may include contract termination, compensation, disqualification of as a supplier and or reporting to the relevant authorities for further investigation and action.

If atNorth's actions or decisions have contributed to the supplier's failure to comply with the Supplier Code, atNorth is committed to working collaboratively with the supplier to provide remedies to affected individuals. This commitment does not diminish the supplier's responsibilities or warranties related to the same.

References

The following standards were used in preparing this Code and may be useful sources of additional information.

Eco Management & Audit System

http://ec.europa.eu/environment/emas/index_en.htm

Ethical Trading Initiative

www.ethicaltrade.org/

ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

ILO International Labor Standards

www.ilo.org/public/english/standards/norm/

ISO 14001

<http://www.iso.org/iso/home/standards/management-standards/iso14000.htm>

ISO 45001

<https://www.iso.org/iso-45001-occupational-health-and-safety.html>

Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law

[EUR-Lex - 32019L1937 - EN - EUR-Lex \(europa.eu\)](http://eur-lex.europa.eu/lexUri.do?uri=CELEX:32019L1937-EN)

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas

http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html

OECD Guidelines for Multinational Enterprises

<http://www.oecd.org/corporate/mne/>

SA 8000

<https://sa-intl.org/programs/sa8000/>

Social Accountability International (SAI)

<http://www.sa-intl.org>

Universal Declaration of Human Rights

<https://www.un.org/en/universal-declaration-human-rights/>

United Nations Convention Against Corruption

<http://www.unodc.org/unodc/en/treaties/CAC/>

United Nations Convention on the Rights of the Child

<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

United Nations Convention on the Elimination of All Forms of Discrimination Against Women

<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>

United Nations Guiding Principles on Business and Human Rights

https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf

United Nations Global Compact www.unglobalcompact.org United States Federal Acquisition Regulation

www.acquisition.gov/far/