



Nimlas Group – Supplier Code of Conduct

Nimlas Group was founded in 2021 with the aim of becoming the leading technical installation services company in the Nordics. The group consists of well-managed and profitable small and medium-sized companies with a premier position in their respective markets. Having a common decentralized business model and shared values together with efficient and sustainable processes in areas that create value, we secure our customer's, owner's, and employee's investment.

Nimlas Group is committed to upholding the high standards of integrity, responsibility, and ethical conduct. Our business strategy and core values emphasize respect for people, communities, and the environment. The Nimlas Group Supplier Code of Conduct (the “Nimlas Code”) is founded on principles outlined in the UN Global Compact, OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights. This Code surpasses local legal requirements where necessary to maintain these high standards.

Scope

The Nimlas Code applies to all Suppliers, including agents, consultants, contractors, distributors, intermediaries, service partners, and suppliers engaged in any capacity with Nimlas Group. Our aim is continuous improvement and the aspiration to exceed mere compliance, focusing on People & Human Rights, Environment and Climate, and Business Ethics and Anti-corruption.

Compliance with Laws & Regulations

As a Suppliers you must:

- comply with applicable laws and regulations, and the principles of this Code.
- ensure awareness and compliance among employees, subcontractors and all workers, including migrants, students, and temporary staff.
- apply the Nimlas Code all the way in your own supply chain.

Implementation

As a Supplier you are responsible for adhering to the Nimlas Code and ensuring your partners do the same. This includes regular monitoring and enforcement of these standards within your supply chain.

Due Diligence & Follow-Up

Nimlas is dedicated to collaborating with Suppliers to enhance compliance and performance related to the Nimlas Code. Hence, as a Suppliers you shall conduct self-audits and permit audits by Nimlas or an authorized third party.

Consequences

Non-compliance with Nimlas Code may lead to termination of the partnership. Nimlas reserves the right to act decisively in cases of significant non-compliance, while minor issues should be rectified within a mutually agreed timeframe.



People & Human Rights

As a Nimlas Supplier you are expected to:

- provide working conditions aligning with international labor standards in line with the eight core conventions of the International Labor Organization.
- uphold human rights, including children's rights, and avoid child and forced labor.
 - The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.
 - The term "Forced labor" includes debt bondage, trafficking, and other forms of modern slavery and workers shall not be required to lodge a money deposit or original identity papers.
- practice non-discrimination and promote diversity and inclusion.
- adhere to fair working hours and employment terms and Suppliers shall ensure that overtime is consensual and be able to evidence the reason for these cases when they occur.
- ensure that its workers, including agency workers, are employed on a fair basis, in accordance with local regulations and do not have to pay any fees to be employed.
- respect workers' right to establish, join or not join trade unions and any other association of their choice. The supplier shall support the right of representative unions and workers to bargain collectively.

Environment & Climate

As a Supplier you are expected to:

- comply with all applicable environmental laws and regulations including actions to mitigate threats to habitats and biodiversity, and actively reduce their ecological footprint.
- support Nimlas's commitment to a circular economy.
- put similar environmental expectations on their own supply-chain.
- set and pursue climate targets, minimizing harmful environmental impacts. All Suppliers are encouraged to calculate their total CO2 emissions within the company according to the official GHG (greenhouse gas) protocol ways of measuring.

Business Ethics & Anti-Corruption

Nimlas demands from you as a Supplier:

- ethical conduct and integrity in all business activities including respect and comply with all applicable fair trade, competition, and anti-trust laws, and refrain from entering into any understanding or agreement that would hinder competition.
- zero tolerance for bribery, corruption, and conflicts of interest.
- adherence to fair competition, data protection laws, and trade sanctions.
- a communicated process for their personnel to be able to raise any concerns without fear of retaliation ("Whistleblowing").



- to ensure that no business that we do in any way supports, conflict, drug trade or slave trade.
- respect everyone's right to the protection of personal data and the right to integrity in connection with the processing of personal data, in accordance with applicable laws and regulations.

Confidential information

As a Supplier you respect all confidential information that concerns Nimlas and our stakeholders. Nimlas demands from you as a Supplier to:

- take all reasonable measures to prevent confidential information from being disclosed to any person who does not need to have the right to that information in the course of their work.
- ensure the protection of confidential information entrusted to you by Nimlas, our customers and others.
- do not act on confidential information received in error, whether it has come from Nimlas, our customers or others. You contact the sender and disclose the situation to Nimlas.

Sanctions

As a Supplier you respect, and we demand from you as a Supplier to:

- know your external parties and you are transparent about the real beneficial owners with whom Nimlas conducts business.
- respect and observe that Nimlas is vigilant in watching for external parties who may be on a sanctions list or may have a related company in a country subject to sanctions.
- report to Nimlas if you have questions or concerns regarding sanctions laws and regulations.

Reporting misconduct and no retaliation

As a Supplier you shall report deviations with the Nimlas Code. Nimlas never exposes anyone that in good faith reports suspected or found unethical behavior for retaliation and we do not accept any such thing on the part of you as a Supplier. Nimlas provides a whistleblowing service through the Finnish and Swedish subsidiaries' websites, to protect and maintain anonymity and confidentiality.

How to report a concern

You can report a concern to the relevant Nimlas manager, or by contacting the Human Resources Department.



Confirmation of Compliance

We, the undersigned, hereby confirm our commitment to comply with the Nimlas Supplier Code of Conduct.

Date: _____

Company Name: _____

Name, Surname: _____

Authorised Signatory: _____