

Document Code of Conduct	Type of document Demand	Examined by Chief Procurement Officer, Corporate Sustainability Director	Document responsible Chief Executive Officer & President
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# CODE OF CONDUCT

## Purpose

NOTE is pledging itself to the pursuance of a responsible and sustainable business. The ideals of NOTE also entail corporate responsibility in all aspects of its business.

This Code of Conduct outlines NOTE's principles regarding acceptable business behaviours and applies to all stakeholders including our Suppliers, who are required to adhere to these principles to be compliant with our terms and conditions.

The purpose of this Code of Conduct is to call for a standard of corporate responsibility in the fields of human rights protection, fair employment, safe working conditions, environmental care, and anti-corruption.

NOTE is a signatory to UN Global Compact and support UNGCs Ten Principles Therefore, this Code of Conduct is inspired by the UN Global Compact Initiative.

## Demands

It is the responsibility of all stakeholders to ensure that their employees as well as subcontractors are informed, and comply with, this Code of Conduct.

Should NOTE request, any Supplier should provide NOTE with information and access to its premises enabling NOTE to verify that the Supplier and its subcontractors comply with the Code of Conduct.

NOTE and its stakeholders hereby stipulate the under mentioned statements to be our mutual Code of Conduct

## Introduction

Employees and other stakeholders must make good, ethical decisions based on our fundamental values of honesty, integrity, promise keeping, fairness, respect, concern for others and personal accountability.

Employees must always make decisions that are both legal and ethical.

Ethical decision-making requires using common sense and good judgement, considering, and evaluating a course of conduct considering the following guiding principles:

- We will show uncompromising honesty and integrity in all the company's activities and relationship
- We will avoid all conflicts of interest between work and personal life
- We will respect the dignity and worth of all individuals
- We will encourage individual initiative and innovation in an atmosphere of flexibility, cooperation, and trust
- We will promote a culture where promise keeping, fairness, respect and personal accountability are valued, encouraged, and recognised

- We will create a safe workplace
- We will protect the environment

Furthermore, as part of our corporate and social responsibility we take care of our employees and their working conditions. It is important to respect the principles outlined in the conventions of the International Labour Organization, especially regarding the following topics:

### **Labour Standards**

We (NOTE and its stakeholders) affirm our responsibility to vindicate human and labour rights within our business operations and within our sphere of influence.

- Forced or compulsory work is prohibited. Every employee works voluntarily and shall be free from any type of coercion or pressure to the contrary.
- The use of child labour is completely forbidden. In the case of NOTE's overseas suppliers, local laws on this topic should be followed regarding the permitted minimum age to hire someone. If local laws do not specify this, then ILO conventions must be complied with (ILO C138). We pledge ourselves to ensure that adequate and verifiable mechanisms for age verification are used in the recruitment procedures. We will not employ any person when such an employment could conflict with the proper completion of compulsory education.
- We undertake not to employ a person below the age of 18 for a work that could be hazardous or in conflict with the physical, mental, spiritual, moral, or social development of the person in question.
- We support and respect the right of association for all our employees. Employees may freely choose to join, or not to join, any trade-union or similar external organization.
- We affirm that our employees, maintaining good faith, will have the right to make collective bargaining.
- We affirm that our employees have the right to healthy and safe working conditions.
- The principle of fairness shall always be applied. Regarding remuneration, working hours, training, health and safety and career opportunities.
- Equal opportunities shall always be promoted. Any kind of discrimination shall be avoided, and everybody is free to apply for any position in the company. The criteria used to select employees shall be in alignment with the job requirements. This shall include specific skills, technical knowledge and labour laws but never considering the physical, ethnical, religious, sex or any other personal background.
- Respect and dignity shall always be maintained by all of NOTE's stakeholders. Coercion of any kind (sexual harassment, psychological or physical aggression, and verbal abuse) is forbidden.
- We support and respect the protection of human rights and freedoms, as being proclaimed in the Universal Declaration of Human Rights.
- We support and respect other human rights declarations, such as the European Convention for the Protection of Human Rights and Fundamental Freedoms.

## **Environment**

NOTE considers protecting the environment equal to other management functions. To minimise our environmental impact concerning our activities, products, and services we shall:

- Comply with all applicable legal requirements and other requirements to which NOTE subscribe to, which relate to our environmental aspects
- Include the consideration of environmental issues in all business strategies and initiatives
- Prevent pollution, reduce waste via recycling and minimise our consumption of natural resources and minimise our carbon dioxide footprint
- Encourage environmental protection amongst our suppliers, subcontractors, and contractors
- Minimise significant adverse environmental impacts of new developments using integrated management processes and planning
- Ensure all our factories maintain certification to ISO14001 and that all our employees understand and conform to that standard.

Under this heading, NOTE also consider that the health and safety of employees, visitors, contractors, and members of the public is of paramount importance.

Each NOTE Company and its stakeholders are responsible for ensuring compliance with current, applicable legislation and company procedures and for organising, planning, and providing sufficient resources for these requirements.

- We will provide adequate control of the health and safety risks arising from work activities
- Consult with employees on matters affecting their health and safety
- Provide and maintain a safe environment, equipment and working conditions
- Ensure safe handling and use of articles and substances
- Provide adequate information, instruction, and supervision for employees
- Ensure all employees are competent to do their tasks, and to get them adequate training
- Prevent accidents and cases of work-related ill health

## **Anti-Corruption**

NOTE commit to prevent bribery and corrupt activities, and this should be the responsibility of all employees, subcontractors, and contractors.

NOTE will not tolerate any kind of improper payments, neither to, nor from any member of the management or person being on the staff.

NOTE also endeavour to ensure that all our business-partners will observe our commitments, as being stipulated in this Code of Conduct.

Standards of fair business, advertising and competition are to be upheld. Means that resources to safeguard customer information shall be available.

## **Roles and responsibilities**

The Group Management at NOTE is responsible for updating the policy and developing relevant support material. The responsibility for implementing this code of conduct lies with NOTE's Managing Directors.

## **References**

OECD Guidelines for Multinational Enterprises

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

United Nations Global Compact Initiative

<https://www.un.org/>

UN Guiding Principles on Business and Human Rights

<https://www.unglobalcompact.org/library/2>

Convention for the Protection of Human Rights and Fundamental Freedoms:

[www.coe.int/en/web/conventions/full-list/-/conventions/treaty/005](http://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/005)

International Labour Organization

<https://www.ilo.org/global/standards/lang--en/index.htm>

The Bribery Act 2010

<https://www.gov.uk/government/publications/bribery-act-2010>

NOTE Sustainability

<https://www.note-ems.com/en/sustainability/>