



Code of Conduct for Suppliers

to NTG

Contents

02	• Introduction by the CEO
03	• Scope & responsibility
04	• Anti-corruption and bribery • Facilitation payments
05	• Conflicts of interest • Gifts and favors
06	• Fair competition and anti-trust
07	• Foreign Trade Control(s)
08	• Human rights • No discrimination • Health and safety
09	• Road safety & quality standards
10	• Environment and climate
11	• Processing of information • Communication and media contact • Data privacy
12	• Compliance with the Code of Conduct • Reporting violations • Breach of the Code of Conduct

Introduction by the CEO

NTG is dedicated to being a good corporate citizen in all its operations and solutions.

Responsible behaviour is a fundamental element of NTG's core values, and customers and other stakeholders expect NTG to conduct business responsibly.

This Code of Conduct for NTG Suppliers ("Supplier Code of Conduct") forms the basis of all actions and activities carried out by third parties for and/or on behalf of NTG, providing suppliers of goods and services, including agents, with guidance on required ethical conduct.

The Supplier Code of Conduct incorporates NTG's commitment to act responsibly with all business partners, including commitments to respect human and labour rights and to prohibit corruption.

By focusing on the values and commitments in this Supplier Code of Conduct, NTG will strengthen relationships with its suppliers by building sustainable business relationships.

We expect our suppliers to require their own agents, sub-suppliers and subcontractors to comply with requirements substantially similar to those in this Supplier Code of Conduct.

NTG is a signatory to the United Nations (UN) Global Compact (UNGC) initiative. Our policies are based on the ten universally accepted principles within human rights, labour standards, environment and anti-corruption provided in the UNGC framework. We encourage all our business partners to support the UNGC initiative.

Thank you for being a responsible business partner of NTG.

Best regards,



Mathias Jensen-Vinstrup
Group CEO

Scope & responsibility

This Supplier Code of Conduct applies to all suppliers and other business partners who operate for or on behalf of NTG, including hauliers, agents, suppliers, sub-suppliers, business partners or distributors (collectively, “Suppliers”), in relation to Suppliers’ business activities for and/or on behalf of, or otherwise involving, NTG.

The Supplier Code of Conduct supplements applicable laws in the jurisdictions where our Suppliers operate, as well as relevant global standards. NTG Suppliers must comply with those laws and standards.

We expect that our Suppliers have established processes and maintain policies and procedures to ensure compliance with this Supplier Code of Conduct.

This Supplier Code of Conduct applies to the full supply chain of NTG, as described herein. Suppliers must ensure, to the extent feasible,

that their own supply chain business partners substantially comply with the requirements of this Supplier Code of Conduct.

This Supplier Code of Conduct forms an integral part of agreements between NTG and Suppliers, including agreements made by e-mail or other electronic communication.

It becomes binding upon a Supplier on the earlier of a) its electronic or written signature of this document, or b) its agreement to any work order, agreement or other document initiating a commercial relationship with NTG. The Supplier Code of Conduct can be found [here](#).



Suppliers must ensure, to the greatest extent possible, that the supplier’s own business partners also comply with the requirements of this Code of Conduct.

Anti-corruption and bribery

A simple definition of corruption is for Person A to offer something of value to Person B, so that B does what they are not supposed to do, or does not do what they are supposed to do. A more legal definition is that someone offers or gives something of value (a bribe, e.g., money, jewellery, school scholarship, political campaign donation) to a public official or other person, to obtain an improper business advantage, e.g., giving a bribe to a public official to help a company win a government tender. Corruption harms society in general, and free competition. Corruption and bribery are often used interchangeably.

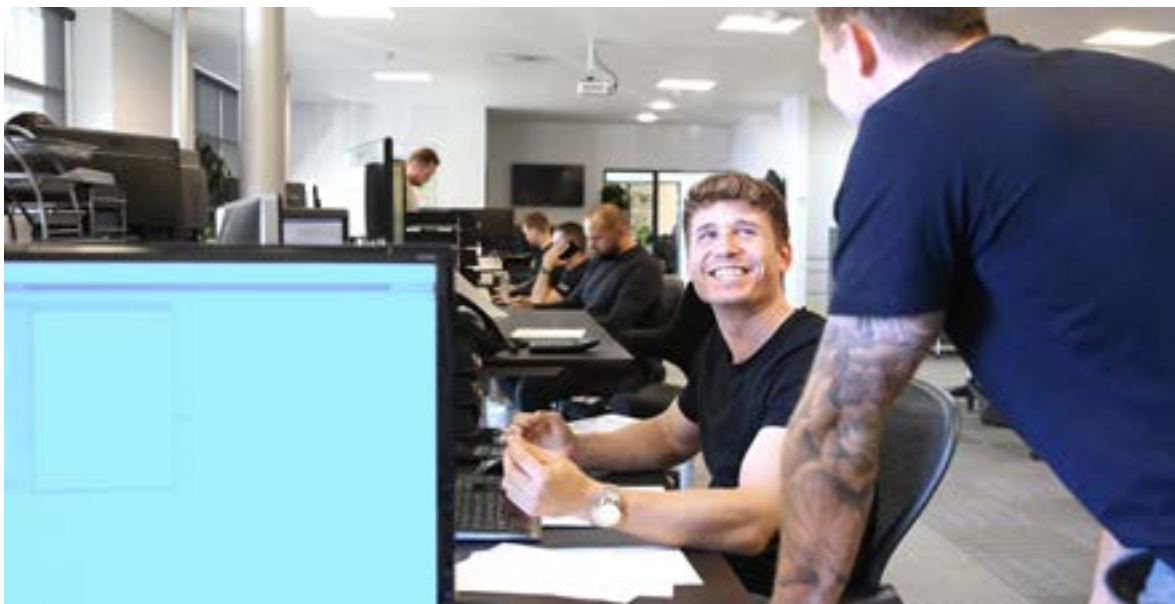
Corruption is illegal in every country, and some, such as the United Kingdom (UK), United States US) and many European Union (EU) countries, including Denmark, have laws prohibiting their companies or citizens from engaging in corruption anywhere in the world. Individuals offering, giving, receiving, soliciting or facilitating a bribe in any way commit corruption.

A company or other organization can be guilty of

corruption if an employee, director, or third party acting on its behalf, engages in corruption to benefit the organization, and the organization knew or should have known of that behaviour but did not act to prevent it.

NTG is committed to prevent the occurrence of bribery in all activities under our effective control. Suppliers shall comply with the anti-corruption laws of the countries in which they operate.

NTG prohibits employees and Suppliers from offering or accepting bribes in any form, direct, indirect or through third parties, no matter how small the amount, to any public official or other person.



Facilitation payments

A facilitation payment is a small personal payment (usually USD one hundred fifty (150) or less) to a low level public employee, to expedite or ensure the performance of a routine government action that the company or payor is legally entitled to receive without making a payment, such as processing official documents or permits.

NTG's Suppliers may not make or accept facilitation payments, regardless of whether that is considered common local practice. NTG will not penalise a Supplier for refusing to pay a bribe even if it results in NTG losing a business opportunity. Good business is clean business, and we don't want business that is not clean. The prohibition of bribery applies without exception, including when our competitors resort to bribery.

The only exception is if the Supplier believes that its or another person's life, health or safety may be at risk. In these cases, payment may be made but must be reported immediately to your contact person at NTG.

Money laundering

Suppliers shall take all necessary steps to prevent money laundering in their organizations and value chains and shall comply with applicable anti-money laundering laws, including reporting suspected violations.

Conflicts of interest

The personal interests of a Supplier and/or its owners, directors or employees (collectively "Employee") must never influence their work for NTG, if those interests are incompatible with NTG's business and values. Such potential conflicts of interest occur when:

Supplier's employee and an NTG employee are close family members or friends, or business partners, and they deal with each other in their

usual work functions;

- An actual conflict of interest occurs if they collaborate in ways not in their employers' best interests, e.g., the NTG employee agrees pay the Supplier an unusually high price for services. An NTG employee a) is employed by or on behalf of the Supplier, b) effectively controls the Supplier, or c) owns at least 10% of the Supplier, or is a close relative or friend of someone controlling the Supplier;
- An actual conflict of interest occurs if the NTG employee provides unusual benefits to the Supplier, e.g., by arranging to purchase services from the supplier without disclosing this to NTG.

Suppliers must notify NTG if any situation could result in a conflict of interest. If a Supplier becomes aware of a potential or actual conflict of interest, this must be reported to your NTG contact person.

Gifts and favors

Giving or receiving business-related gifts and entertainment in connection with building business relationships with or showing appreciation to individuals who are employed by private commercial companies is permissible if it is not done for a corrupt purpose and is a common custom in the country in question.

Suppliers must not allow gifts and hospitality to influence their objectivity and independence, or cause others to suspect such an influence. Suppliers may not offer gifts or hospitality when it could affect, or be perceived to affect, the outcome of a business transaction. Even gifts of moderate value should only be offered or accepted where this is an accepted, usual business practice.

NTG's Suppliers may never accept or offer cash or the cash equivalent such as gift vouchers or prepaid cards.

Fair competition and anti-trust

The purpose of competition and anti-trust laws is to promote fair competition between competitors by preventing agreements and practices that unreasonably limit free competition.

NTG welcomes open and fair competition and prohibits violations of competition laws and regulations in any jurisdiction. This includes collaborating with competitors to:

- allocate customers or markets,
- form cartels,
- share or split markets,
- disclosure or exchange improper information, e.g., planned price adjustments,
- and fixing prices or tender offers, or other oral or written price cooperation.

NTG has internal rules prohibiting such activities.

Likewise, our Suppliers must reject such illegal practices.

If NTG detects that a Supplier is violating competition or anti-trust laws in any jurisdiction, it will take immediate and appropriate action regarding the contractual relationship between NTG and the Supplier, as well as notifying and cooperating with public authorities.



Foreign Trade Control(s)

NTG complies with applicable international and national trade sanctions and embargoes and export (and import) controls. Sanctions restrict or prohibit business transactions with certain countries, organisations, and persons, including prohibiting any dealings with a country or government, or restricting exports (or imports) of certain types of goods or technology to certain countries or areas.

Export Controls are requirements for permits to export certain items to certain countries, especially dual use items that have ordinary commercial uses, but also potential weapons, military or law enforcement uses. Export controls also restrict providing dual use technology to certain countries or parties.

NTG Suppliers shall comply with foreign trade control laws and regulations imposed by the UN, the EU, UK, and US, applicable to their business or services.



NTG expects that its suppliers comply with all applicable foreign trade control laws and regulations imposed by the United Nations, the European Union, the United Kingdom, the United States of America, or other relevant regulator, which apply to their business or services.

Human rights

NTG supports and incorporates in its work key elements of the internationally recognised UN Universal Declaration of Human Rights, the UN's International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and international conventions on child labour. Suppliers must comply with applicable laws and support and act in compliance with all internationally recognised standards of human rights, labour standards and conventions on child labour.

No discrimination

Suppliers shall support and provide equal opportunities for all employees and business partners, and identify and work actively against discriminatory treatment based on race, gender, religion, age, nationality, sexual orientation, disability, personal political orientation, or ethnic or social background, all within the scope of applicable laws. Suppliers shall comply with all applicable laws regarding discrimination.

Labor Rights

Suppliers shall comply with applicable laws and industry standards governing employee working hours and wages and other remuneration, including overtime. They shall prohibit forced labor, including withholding employees' official documents, human trafficking, and if applicable, comply with the UK Modern Slavery Act.

Health and safety

NTG is committed to securing a safe and healthy workplace, ensuring employee satisfaction, and providing talent-based advancement opportunities for all employees on an equal and non-discriminatory basis.

Suppliers shall provide safe and healthy working environments for all their employees. Suppliers shall implement procedures to ensure they comply with all applicable laws and have taken appropriate measures to prevent the use and abuse of alcohol, drugs, or other unlawful





In case of fatal accidents and/or serious injuries which potentially could lead to claims or liability for NTG or NTG's customers, suppliers are expected to report these as soon as possible to their contact person at NTG.

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Road safety is an important matter for NTG, our customers and the community in general. Our Suppliers shall, in cooperation with their subcontractors, conduct road safety initiatives that are continuously evaluated and improved. The initiatives should ensure that our Suppliers always comply with applicable traffic regulations and reduce unnecessary hazards or risks.

Suppliers must comply with applicable health and safety laws, including transport and road safety laws. Suppliers performing road transport operations within the EU must also comply with all the requirements under the EU Mobility Package requirements, including rules on driving times and rest periods, working hours, posting and cabotage.

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Hauliers: In addition, hauliers shall comply with applicable laws for driver breaks and rest periods, and shall document such breaks and rest periods,

e.g., 45-hour rest periods where required. Hauliers shall use all reasonable efforts to secure safe parking and acceptable housing for breaks and rest, including in transport planning, and shall document situations where such facilities are not available, e.g., due to local infrastructure.

Acceptable housing requirements include hauliers, at their own expense, providing drivers access to:

- **Single-bed rooms with at least the level of privacy as in a truck cabin;**
- o **Rooms shall have electricity and heating, and storage lockers;**
- **Toilets, showers, washing machines and dryers, unlimited potable water and recreational facilities;**
- **Food stores within a reasonable distance by foot or public transportation.**

Quality standards

Suppliers shall implement and maintain appropriate measures to comply with applicable laws, and proactively implement any changes in their internal policies to meet changes in any local laws and requirements and be prepared for any disruptions of their business (for example, pandemics, terrorism, natural disasters, cyberattacks).

NTG requires that any equipment used when providing services to NTG is of good and sound quality, meets general and statutory

maintenance standards, and always complies with applicable safety regulations or measures. Suppliers must ensure that equipment used to provide services for NTG is maintained regularly to ensure that it always complies with applicable environmental requirements and has as low an environmental impact as possible.

Suppliers shall comply with any reasonable quality requirements NTG or NTG's customers may have in respect of handling and stowing. However, Suppliers are not obliged to comply with specific requests that may be contrary to traffic safety regulations or similar regulations in the jurisdictions in or through which the transport is to occur.



Freedom of Association

To the extent permitted by local laws, Suppliers shall permit employees to freely and without interference form and join trade unions or other employee representative associations and shall not penalize employees for doing so. Suppliers shall not intimidate or unreasonably try to convince employees not to form or join trade unions or penalize employees who do so.

Environment and climate

As an asset-light freight forwarder, most of NTG's climate impact relates to indirect emissions from transport activities of our Suppliers. Collaboration with customers and support from Suppliers are therefore crucial elements for NTG's efforts to decarbonise our value chain. We expect our suppliers to support NTG's decarbonisation efforts and collaborate on joint projects and share any relevant data upon request.

Our Suppliers shall comply with applicable local and international laws and regulations on the protection of the environment and climate, and provide documentation of valid certifications, authorisations or permits upon request by NTG.

Suppliers performing road transport operations shall keep

the idling of their vehicles and other equipment to an absolute minimum. No idling is allowed when the Supplier is present at a NTG location for loading or unloading, unless necessary to complete the operation.

Hauliers must keep their drivers updated on relevant driving techniques and, to the extent possible, use the vehicles' internal driving mode setting to ensure the lowest possible fuel consumption from the operations.

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Processing of information

NTG strictly prohibits the disclosure of any business-sensitive information about the company or customers that is not in the public domain, such as sharing information about the names of customers externally to parties not involved in servicing the customers, or distributing such information through social media or other external media.

Confidential or proprietary information may only be disclosed to a third party if authorised in writing through a non-disclosure agreement with NTG, and subject to written and binding non-disclosure provisions between Supplier and the third party, or if disclosure is required by law.

Communication and media contact

No Supplier may make statements on behalf of NTG about NTG or our business to the media, investors, financial or industry analysts or in social media or other public fora or contexts. All media inquiries involving NTG must be referred immediately to your local NTG representative, who is instructed to refer the matter to NTG's Group Management. Suppliers may use NTG's name for their commercial purposes, e.g., as a reference, only with NTG's prior written consent.

Data privacy

In the transport and logistics industry, vast volumes of data are generated daily, for example through vehicle locator systems and video surveillance monitoring systems.

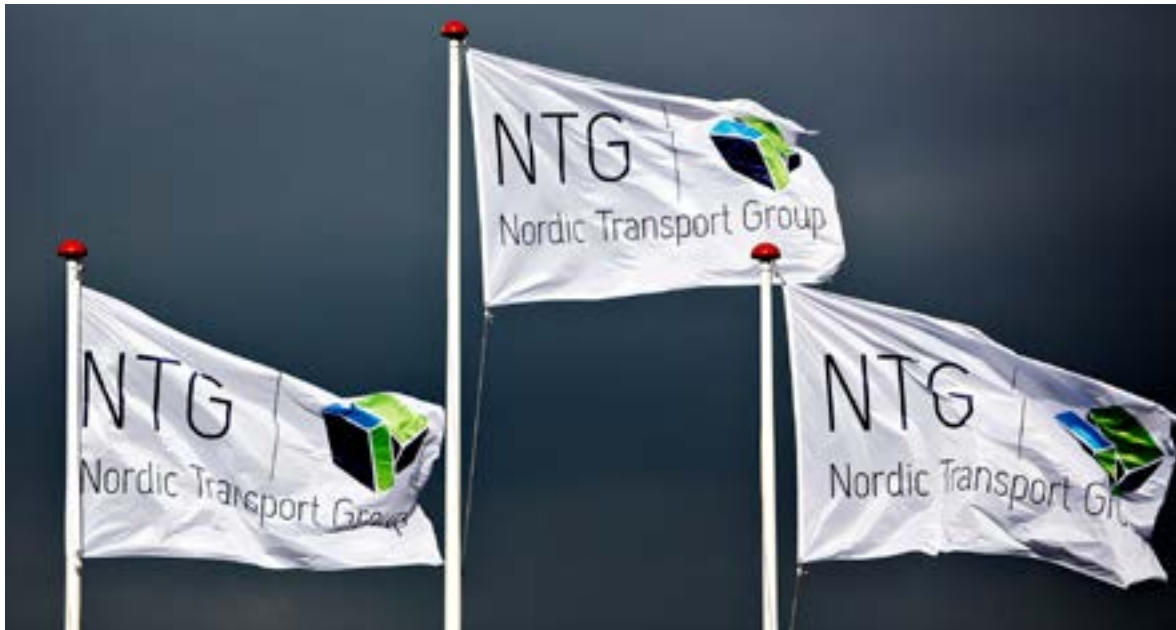
NTG collects data about Supplier employees, for example name, email address and telephone number, and we keep a record of our correspondence with them. We do so as this information may form the basis of a contract with the Supplier.

NTG complies with applicable data privacy legislation, and your information is safeguarded by our information technology system. Personal details are only used and processed to the legally permissible extent required. Suppliers shall likewise comply with applicable data privacy legislation, e.g., ensuring that the personal data of the employees of NTG and its customers are processed and stored securely and confidentially on a need-to-have basis.

IT SECURITY

Supplier shall maintain IT systems that securely store NTG data, in particular ensuring such data remains confidential. Systems shall have security measures in place to prevent hacking and other intrusions, and ensuring access to NTG data only on a need-to-know basis.

Suppliers shall comply with NTG's IT security requirements set out in any agreement with NTG.



Compliance with the Code of Conduct

Suppliers shall comply with this Supplier Code of Conduct in relation to their business activities for and/or on behalf of, or otherwise involving, NTG. Requirements in this Supplier Code of Conduct supplement obligations under contracts between NTG and the Supplier.

Suppliers shall, on request, provide NTG with all reasonable data and other information NTG requires to fulfil its statutory reporting obligations and other reasonable reporting needs, e.g., in compliance and sustainability.

To ensure compliance with this Supplier Code of Conduct, NTG or an independent third party appointed by NTG may conduct audits of Supplier, at NTG's reasonable discretion and without prior notice, including at Supplier's premises.

Reporting violations

NTG encourages Suppliers' employees to speak up if they become aware of a breach of law or a breach of this Supplier Code of Conduct, relating to the topics covered above, or other violations of laws,

e.g., if Supplier becomes aware of an act of fraud by its employees against NTG. Suppliers must report violations to their NTG contact persons or to [NTG's online Halo Whistleblower System \(Speak Up\)](#).

Breach of the Code of Conduct

In case of with a breach of this Supplier Code of Conduct, Suppliers must take appropriate measures to remedy such breach and to prevent any reoccurrence, and NTG will take reasonable steps at its discretion to assist Supplier's mitigation efforts. If NTG reasonably deems the breach to be material, or a repeated breach, or that Supplier has failed to adequately remedy a breach NTG has notified, NTG may terminate the business relationship with immediate effect and without any liability towards the Supplier.

This Code of Conduct is also available at ntg.com. Suppliers are required to familiarise themselves with the content of this Code of Conduct.

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