

# Nobina's Supplier Code of conduct

An aerial photograph of a city street, likely in a European city, showing a mix of historic and modern buildings. A large white text box is overlaid on the center of the image. The text is in green and black. The background shows a street with a tram, pedestrians, and various buildings, including one with a prominent tower.

## Nobina's Supplier Code of conduct

The Nobina Group is the Nordic region's largest and most experienced operator in public transport. Every day, Nobina ensures that people get to work, school and activities by delivering contracted public transport on behalf of the public authorities in Sweden, Norway, Finland and Denmark. The group is an industry leader in terms of profitability, development and initiator of a healthy industry.



## Our expectation

The demands for delivering and providing goods and services produced under both sustainable and responsible conditions are constantly increasing. It is a task that needs to be done collectively, Nobina together with suppliers and partners; that's when we can make a difference. Suppliers and partners thus have a great responsibility to comply with the regulations but also to drive development forward. Signing this code of conduct (the "**Code**"), means that suppliers and partners take responsibility for ensuring that the requirements specified therein will be followed. It also means that suppliers and partners should work according to documented procedures aimed at ensuring that the production of goods or provision of services delivered is carried out under conditions compatible with the regulations below. Overall, this means that work to monitor and control one's supply chain is of high importance.

In general, the Code stipulates that suppliers and partners should, as a starting point, have documented and well-established work throughout the organisation regarding sustainability and the

aspects related to the specified regulations. There should be documented and established control or target documents, alternatively policies, management decisions, strategies, or equivalent that address sustainability from these perspectives.



## Scope

The Code applies to all Nobina’s suppliers, sub-contractors and business partners, (the “**supplier/suppliers**”), providing products and/or services to Nobina. The Code also applies to the

suppliers’ employees, whether directly or indirectly contracted, permanently or temporarily employed, subcontracted, or supervised (“**employees**”).

## Basis for the Code

The supplier must comply with the principles of the **UN Global Compact**, the **UN Declaration of Human Rights**, as well as the **ILO Declaration** on basic principles and rights in working life from 1998, in accordance with national laws and practices.



## Human Rights and Fair Employment Conditions

### The supplier shall ensure that:

- Legislation in the countries in which the supplier operates is respected and always represents a minimum level of employee terms
  - Occupational safety and health and safety legislation
  - Labor law, including legislation on minimum wage, and the social insurance coverage
- UN Universal Declaration of Human Rights (1948) is met
- ILO Convention is complied with, especially number:
  - 29, 105 No occurrence of forced labor
  - 87, 98 Freedom of association and collective bargaining
  - 100, 111 No occurrence of discrimination and harassment
  - 138, 182 No occurrence of child labor
  - 155, 170 Safe and hygienic working environment
- UN Convention on the Rights of the Child, Article 32, is met
- Exploiting someone in the form of forced or punitive work is not accepted
- Discrimination based on ethnicity, sex, religion, social origin, disability, political or sexual orientation must not occur
- Integrated work environment that values diversity among its employees is promoted
- Salary shall be paid directly to the employee at the agreed time and in full. The national statutory minimum wage is the lowest accepted wage level. The weekly working time may not exceed the legal limit and overtime should be paid or compensated for
- Benefits such as pensions, health insurance for employees and their families, as well as education/internship opportunities is provided. The benefits may vary depending on local market factors, contract type, and other similar aspects.

## Environment

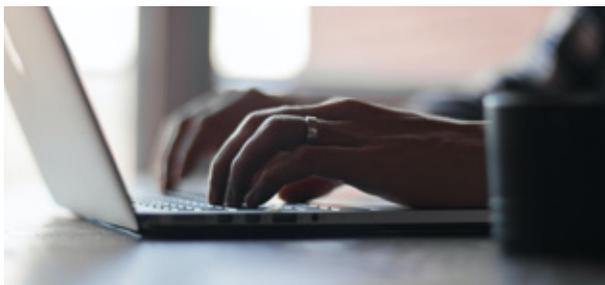
We expect our suppliers and partners to have a holistic perspective on environmental issues and use routines to reduce both their energy and resource consumption as well as their waste and land, atmospheric and water emissions.

Chemicals should be handled in a safe and safe manner for man and nature. The supplier shall comply with the environmental protection legislation applicable in the respective country.



## Health and Safety

The supplier's working environment should maintain a level that complies with international guidelines. Employees shall be informed of any health risks that the work may cause. All employees must have access to and use relevant protective equipment.



## Data protection

The supplier shall comply with relevant data protection and security laws and regulations, in particular personal data about customers, consumers, employees, and shareholders. The supplier shall meet all these requirements when collecting, processing, transferring, or using personal data.

## Bribery and corruption

The supplier shall comply with all national and international laws, the UN Declaration against Corruption, the taking of bribes and applicable anti-corruption laws, regulations, and norms. The Supplier shall not (either directly or indirectly) offer, promise, request, demand or accept bribes or other improper favours to retain a customer or retaining business.



## Money laundering and financing of terrorism

The supplier shall comply with relevant laws and regulations regarding money laundering and terrorist financing. The supplier shall engage in legal business activities and with funds from legal business activities.

## Continuity

The supplier should be prepared for any interruptions in his activities (e.g. natural disasters, terrorism, software viruses, illnesses, pandemics, infectious diseases). This emergency preparedness includes disaster plan that aims to protect both employees and the environment against the effects of potential disasters arising in the area of activity as far as possible.

## Trade regulations

The supplier shall comply with all applicable trade and import regulations, including sanctions and embargoes that apply to their business. This means that the supplier shall not employ or have business relationships with individuals or companies that are subject to international sanctions and that Nobina also refrains from entering contracts that could pose a threat to national security interests.



## Traceability in the supply chain

The supplier shall work towards achieving 100% traceability in the supply chain. The supplier shall implement a due diligence process equivalent to the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as the EU's battery regulation in force from time to time.



## Conflicts of interests

A conflict of interests arises when a person has a personal interest that could prove to affect their decision. Such conflicts of interest include a relationship through relationship or marriage, partnership, partnership, or investment. The supplier shall disclose any actual or potential conflicts of interest with Nobina's staff.



## Compliance and follow-up of the Code

By signing the Code, the vendor, CEO / responsible company signatory, certifies that the supplier, and any subcontractors, comply with the requirements and commitments that follow from those formulated in this document.

To demonstrate compliance with the Code, the supplier shall participate in Nobina's Code monitoring by, among other things, providing relevant documentation upon request and conducting self-risk assessments. The signature further entitles Nobina to investigate, through inspection, or otherwise, compliance with the requirements of the document.

In case of deviations from the Code, the supplier shall provide a corrective action plan for approval by Nobina. The supplier is responsible for ensuring that suppliers in their supply chain adhere to the principles described in the Code. These parties may

also be requested to participate in self-assessments and audits organized by Nobina if Nobina requests it. Failure by the supplier to establish a corrective action plan or comply with such plan or any breach of the obligations stated in the Code is considered a material breach by the supplier.



## Report violations of the Code

Deviations and breaches of the Code must be reported without delay by e-mail to: **compliance@nobina.com**, where the supplier shall state which deviations or breaches have occurred and state the responsible contact person including contact details at the supplier.

This contact person must be available and be familiar with current issues. The supplier shall have procedures in place to protect whistleblowers in accordance with local laws and regulations and to prohibit punishment of workers who submit reports in good faith.

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## Update of the Code

The Code will be updated if and when relevant. The supplier shall always comply with applicable laws governing their operations. However, Nobina may impose additional requirements through updates of the Code. Nobina will inform the supplier about any updates made. The supplier shall make any necessary adjustments to ensure their work aligns with the latest version of the Code.

If the supplier does not already meet the Code requirements due to such an update, the supplier shall present an action plan on how to meet the new requirements. Nobina also has the right to terminate the contract with the Supplier if the Supplier - after taken measures - still fails to fulfill the Code's obligations.

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**Company name**

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**Signature**

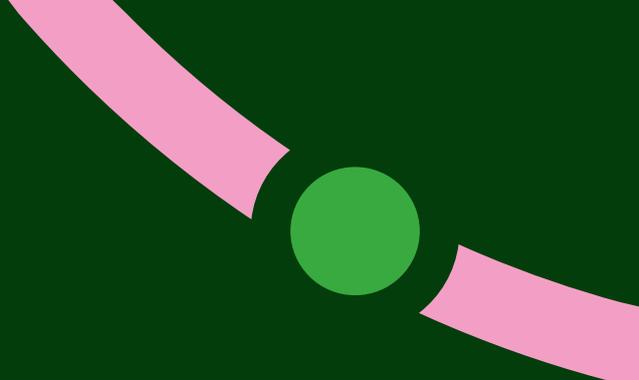
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**Date**

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**Printed name**





**Nobina**

