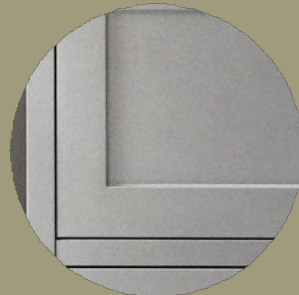


nobia



Code of Conduct

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# Dear colleagues

The kitchen is the heart of the home. It's where families and friends gather and create memories, it's where children grow up and establish their foundation. This is why we think it is so important to design kitchens for life; a healthy life both for the people and the planet. The climate crisis is one of the most urgent challenges of our time. As one of Europe's leading kitchen specialists, we are committed to leading the way in the industry's shift towards a more sustainable future. With 13 brands, some boasting a 100-year heritage, control of the entire value chain and multinational presence, we are in a unique position to drive significant change. We care at the core. We inspire through design. We deliver a green transformation. Through our efforts, we contribute to a sustainable lifestyle for millions of people across Europe. This Code of Conduct serves as our guiding star in being a leading, positive force in society.

Our behaviour matters. By doing what is right, we will be an attractive company to work for, to partner with, and to invest in, but also a positive influence in society. This Code of Conduct acts as our compass to a clear ethical code and a culture of integrity. It serves as one of the most important building blocks of our governance framework. In it, you will find our values and principles and how we work to comply with laws and regulations.

Our business partners are an important part of our operations; hence, we expect them to respect and follow the principles of our

Code of Conduct too. Each of us need to know, understand and apply the principles in this Code of Conduct. In this way, we can collectively protect the long-term business and reputation of Nobia and the society that we live in. This Code of Conduct is a guidance tool for you, to help you navigate correctly in various situations that you might encounter.

Conducting ethical and sustainable business rests with each of us. Together, we are what makes Nobia fantastic. Read the Code, discuss it, and include the values of the Code into your working life.



# Our Code – Our responsibility

Our Code is a public statement that Nobia is committed to doing the right thing. It serves as a valuable resource to help employees and others make informed, ethical decisions. Our Code includes references to relevant Nobia Requirements (Policies, Procedures and Guidelines) and other helpful tools and resources.

## Why we have a Code of Conduct

We want to live up to the highest ethical standards and encode them in a comprehensive Code of Conduct (Code/ CoC) for several reasons. First, high ethical standards are necessary for sustainable and long-term business, which lies at the core of our conviction. Second, because work is an important aspect of life, and the work we provide our colleagues should be characterized by positivity and good health. Third, a CoC that defines our work to a high standard quite simply is the way for us to move forward and have a positive impact on society and the world.

We strongly believe embedding an ethical approach enables our journey moving forward. It lies in the interest of all stakeholder's that companies, such as Nobia, take a greater environmental and social responsibility. For us, sustainable growth is enabled by our zero tolerance for corruption and strong commitment to respecting human rights and environmental protection.

The Code clarifies the ethics and compliance expectations for everyone who works at Nobia. Having one set of standards and behaviours and clear ethical expectations in our code of conduct helps us make choices in a consistent way in the markets we decide to operate in.

## The Code of Conduct forms the basis for our work

Our Code serves as a framework to clarify both the guidelines a Nobia colleague must follow as well as the expectations in terms of each individual's judgement and responsibility.

The Code is an integral part of the Nobia Group Framework comprising Nobia's governance structure and the Group wide internal regulation.

Our Code reflects a principles-based approach, where rules are not stated explicitly and everyday business decisions will be guided by our values, such as they are expressed in our Code, with reference to other resources where relevant.

Operating in 7 countries, as we do, means there may be times when local laws, regulations or customs conflict with our Code. Whenever there is a difference between an applicable legal requirement and our Code, you must apply the strictest standard. Ensure you don't follow customs that violate our Code.

## The Code applies to everyone

The Code and its high ethical standards apply to all our colleagues, regardless of hierarchical position. We expect everyone, including our contractors and their colleagues, to act in a way that is consistent with our Code. However, the expectations are set even higher for

## See something, say something

- We encourage an open and honest workplace culture
- If you notice violations of law, the Code or Group Policies you have a responsibility to notify your manager or another suitable person or function within the company
- Don't be afraid to speak up, we guarantee you that a colleague reporting a violation in good faith will be supported
- You do not have to fear any negative repercussions from speaking up in good faith, on the contrary, we encourage it
- Discrimination or retaliation against a colleague for reporting is a serious violation of the Code.
- We also have a third-party operated SpeakUp function, where your anonymity is guaranteed, which is accessed either online or over the phone

### Nobia Requirements & helpful resources

<https://nobiaab.sharepoint.com/#/start/about-nobia/group-policies>



managers since they are intended to act as role models for others.

Business partners and third parties can have a direct negative impact on us through their behaviour. For this reason, we want to work with business partners that share our commitment to safety, ethics and compliance. Consequently, we will take appropriate measures if they have not met our expectations or their contractual obligations.

#### **What happens if I violate the Code**

Failure to comply with this Code will result in some form of disciplinary action, including, but not limited to, the issue of a reprimand or warning, probation or suspension without pay, demotion, reduction in salary or dismissal, subject to local laws and regulations. Certain violations of this Code may require the Company to refer the matter to law enforcement authorities for investigation or prosecution.

Situations may arise for which there are no specific guidelines. In such situations, you shall act in the spirit of this Code. We encourage all colleagues to discuss such situations with their immediate manager, the People & Culture department or another contact person within Nobia

#### **Raising concern**

You can also raise any problems or concerns anonymously through the whistleblower (SpeakUp) function which is operated by an independent third party. We do however encourage that you provide your contact details, as this will enable you to answer follow-up questions related to the concern. Details on how to use the SpeakUp function can be found on the KitchNet as well as on the final pages of this Code.

## Governance and responsibilities

### Implementation & monitoring

- This Code has been approved by the Board of Directors of Nobia.
- The CEO of Nobia bears the ultimate responsibility for compliance with the Code.
- Local management are responsible for implementing the Code by ensuring that all Nobia's colleagues and partners are familiar with and understand its content.
- Procedures for implementing, monitoring and following up are of the utmost importance for the Code to be effective.
- The Board will receive annual monitoring reports. The Board will then evaluate the situation and, where necessary, decide on and implement any corrective measures.

### Colleague responsibilities

- Read and be familiar with the information in our Code.
- Ensure that you act in accordance with the Code in a manner that is safe, ethical, and consistent with the strictest of applicable laws and regulations and Code requirements.
- Raise questions and concerns if you become aware of possible violations of laws, regulations, our Code or requirements.
- Always co-operate fully when responding to an investigation or audit

### Managers are expected to lead by example

- As a manager you are required to ensure that colleagues in your team receive the necessary training and understand the principles and expectations of our Code.
- Communicate and reinforce the word and spirit of the Code to employees.
- It is the responsibility of Nobia to provide the tools necessary for providing such training.
- Management will not be penalised for any loss of business resulting from adherence to this Code.
- Any manager who directs, approves or ignores any conduct that violates this Code, or who has knowledge of such conduct and does not immediately report it, will also be subject to disciplinary action, up to and including dismissal.

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# Our People

**We bring out the best in everyone. When we respect and value one another we succeed individually and as a company. We all have a role in maintaining a corporate culture based on respect and fairness.**

## **Freedom of association & collective bargaining**

Freedom of association means our colleagues have the freedom to join, not join, or establish any association, we would like to emphasize this right with regards to both organizing and taking part in collective and individual bargaining that is undertaken in accordance with local laws and regulations. No colleague shall be subject to dismissal, discrimination, harassment, intimidation, or retaliation for exercising these rights.

## **Discrimination, harassment & diversity**

We value and promote diversity and gender balance. This means that we provide a work environment where everyone is treated with respect and dignity and given fair and equal opportunities for career advancement and development.

Employment decisions like hiring, pay, title, promotion, discipline, termination, or working conditions should be based on a person's ability and performance, not on irrelevant personal factors. Therefore, we do not tolerate any form of discrimination or harassment in the workplace due to race, ethnicity, sexual orientation, gender, religion, age, disability, political opinion, nationality or any other similar factor. We do not tolerate working conditions or treatment of colleagues that are in conflict with international laws and practices. All colleagues shall be treated and treat others with respect and dignity. Physical or verbal harassment or threats of any kind are never tolerated. For more information on our stance regarding equality and diversity, have a look at our Equality & Diversity Policy.

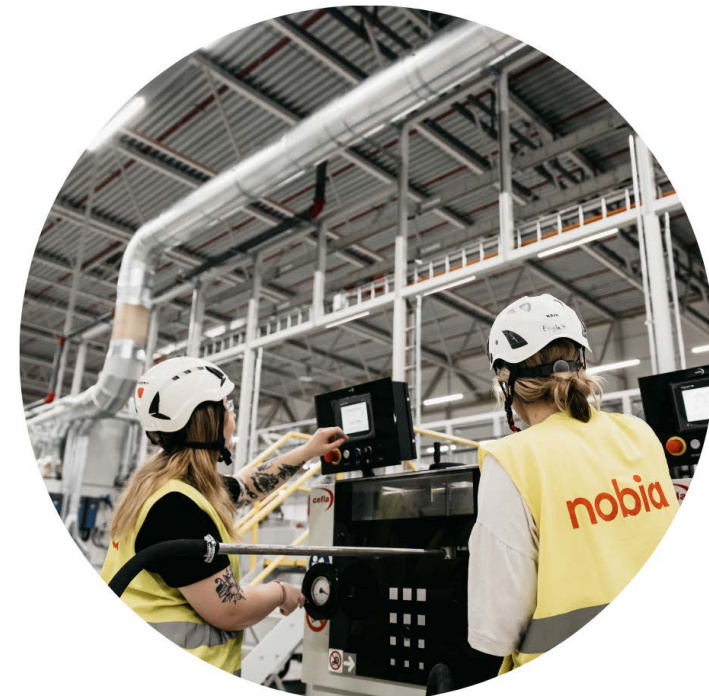
## **Safety in the workplace**

The health and safety of our colleagues is our top priority. We pursue an ambitious 'zero vision' concerning accidents in the workplace and work-related injuries.

We shall ensure that all colleagues receive and understand necessary and adequate information about safety arrangements in their work area such as emergency exits, fire extinguishers, first aid equipment etc. Appropriate safety training before operating machines, equipment or carrying out potentially hazardous operations shall be conducted, and necessary protective equipment shall be provided. If potentially dangerous or unsafe activities in work are noted, actions shall be immediately taken to address them. This can include immediately stopping an activity.

Colleagues shall actively contribute to maintaining and improving safety in the workplace through awareness, dialogue and action. Report any accident, injury, illness, unsafe or unhealthy working condition, or incident to your immediate or other appropriate manager so that suitable action can be taken to prevent, correct or control such conditions. This also applies if you think that you and/or others do not have appropriate safety training or protective equipment, or if you are aware of potential safety hazards.

While at work or when conducting Nobia business, everyone must be able to function with unimpaired judgement. Colleagues shall therefore refrain from any drugs and/or alcohol use. Job impairment as a result of alcohol and/or



substance abuse is a serious matter, may result in disciplinary action, and must be quickly addressed for the health, safety and wellbeing of all. Exceptions can be made if you are prescribed medicines by a licensed physician, if that is the case you should contact your manager and P&C.

In the case of an isolated or wide-spread infection or otherwise contagious pathogen such as a virus or disease, the workplace must have procedures that can be deployed to prevent spread of the pathogen.

All colleagues have a personal responsibility to be involved in and must be committed to support a safe workplace environment and culture. Colleagues also have a personal responsibility to follow all safety guidelines.

#### **Workers' contracts, working hours & compensation**

Colleagues should have the right to annual development talks to further their competence development as mandated by our People & Culture Procedures.

We comply with local laws and regulations regarding workers' contracts and working hours, including overtime and overtime compensation. Salaries should be paid regularly and comply with the applicable local legislation, industry standards and the local market situation.

Colleagues shall not, except on a temporary basis, be required to work a standard work week of more than 48 hours per week or a total work week of more than 60 hours (including overtime). Other than in extraordinary business circumstances, all colleagues shall be entitled to at least one day off in every seven-day period, and to take time off for established national and local holidays.

Colleagues should be granted the stipulated annual leave, sick leave and maternity/ paternity leave without any negative repercussions.

#### **Human Rights**

We are committed to use the UN Guiding Principles on Business and Human Rights to include respect for human rights into policies and procedures.

We do not tolerate any forms of modern slavery, including forced, bonded or compulsory labour, or human trafficking. Each colleague's presence is strictly voluntary. Further, we do not require any form of deposit or confiscate identification papers from our colleagues. Colleagues are free to leave their employment subject to any notice period as required by law and contract. We require the same from our suppliers.

We respect children's right to personal development, including the right to education, the right to rest and play and the right to have the child's basic needs met, in accordance with the UN Convention on the Rights of the Child, Article 32.1. We do not engage in or condone the unlawful employment or exploitation of children among our colleagues and/or in our facilities. We do not consent to child labour anywhere in our value chain.

The minimum age for work should not be below the age for finishing compulsory schooling, which is generally 15 years of age, or 14 years of age in accordance with the exceptions for developing countries (ILO Convention No.138). If relevant national legislation has set a higher age, this age will apply. Work that is likely to be hazardous or harmful to the child's health as well as physical, mental, spiritual, moral or social development or that interferes with the child's education shall not be performed by children between 15 or 18 years of age (young workers).

#### **The grandparent principle**

To ensure fair, objective and financially sound employment-related decisions including recruitment, promotions, job assignments, as well as compensation and termination of employment, all such decisions shall be approved by your local P&C department and in accordance with the grandparent principle. This principle implies that the decision must be approved by both the decision-making manager and his or her immediate manager.

## **What this means for you**

- You are free to join any worker's union or similar organization to safeguard your rights, without fear of repercussions.
- All our contracts – including your employment contract, are and should be legally compliant.
- Under no circumstances should you have to tolerate any harassment or discrimination.
- If you feel harassed or discriminated, contact your manager or a local People & Culture representative for support.
- Do not undertake work that you are not qualified to perform.
- Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported or will report a risk or concern.
- Know the emergency procedures that apply where you work
- Speak up if you observe an unsafe or unhealthy working environment. Listen to others who speak up.
- Stop immediately any work that appears to be unsafe.
- If there is anything about your employment that you feel is not right, such as holiday, sick leave, maternity leave or anything else of that nature – talk to People & Culture.









# How we conduct our business

Nobia's reputation for conducting business in an ethical manner is a valuable asset in our relationship with our stakeholders. We look at the future with sustainability in mind. Sound business ethics and long-term relationships through honesty, integrity and respect for laws and regulations are important elements in this context.

## **Fair Competition**

We believe in that fair competition is in the best long-term interest of our Business, our customers, colleagues and society as a whole. Therefore, we always respect legislation on fair trade and competition. We compete on the merit of our products and services.

We never engage in anticompetitive agreements or practices as we trust that our products and services will succeed in a competitive marketplace. Pricing, costs, profits, market development or other non-public sensitive topics are never to be discussed with competitors without explicit permission to do so.

## **Anti-bribery and corruption**

Bribery and corruption cause market distortion and interferes with free competition and violates laws that carry significant penalties for the companies and individuals involved.

We do not participate in or endorse any corrupt practices, including offering or accepting unformalized and unfair kickbacks, bribes, excessive gifts or hospitality, to or from any stakeholders. Avoid activities that may raise even the appearance of impropriety. In particular, expenses involving government, public officials or public employees, politicians or other public persons or bodies should be closely monitored.

Bribery can take many forms. One of the ways we safeguard against bribes is through transparency, that's why discounts, bonuses and other benefits such as marketing assistance is always put into written contracts.

We will not conduct business with suppliers, vendors or partners that offer bribes, and we will take necessary action if such actions are uncovered.

It is important that concerns are raised about any suspected corruption or violation of laws, rules and regulations – either within Nobia or in dealings with third parties – at the earliest possible stage. We do not use charitable contributions or sponsorships as a vessel for bribery and we will promptly take action to investigate and address any allegations or indications of corruption.

## **Gifts and hospitality**

We must not accept anything from an outside party that could be construed as a bribe and potentially influence the employee's behaviour and duty of loyalty to Nobia. It is important that your relationships with suppliers and customers are conducted in a professional and competitive manner.



Gifts or hospitality given or received shall for this reason be very moderate and characterized by openness and constitute a natural element in the work. They shall be limited in value, for a legitimate business purpose, well documented and reasonable.

In that context any agreement or understanding regarding favours or benefits of any kind in exchange for gifts is not accepted therefore no one at Nobia shall offer, accept, request or authorize a gift or loan that could be regarded as a bribe or an improper benefit. Remember to be extra cautious in all activities related to public entities and publicly owned/financed companies.

#### **Government investigations**

We always cooperate with any appropriate government investigation. If a governmental demand in this respect is put forward, the immediate manager must be informed before any action is taken or commitment is made.

Documents must never be destroyed or altered in anticipation of a government investigation, and misleading or

untrue statements to government investigators must not be made. No coercion or pressure may be put on colleagues to compromise this policy.

#### **Money-laundering**

Money-laundering is any arrangement where the proceeds of crime are disguised or made to appear as legitimate and is something we take very seriously. Being a responsible-corporate citizen entails not in any way assisting with financing crime and other illegal activities.

We are not involved in money-laundering or the proceeds of crime in any way. To ensure this we have policies and procedures in place to make sure our suppliers are vet- ted before we enter into contract with them. In addition, our payment procedures are aimed at preventing payments to suspicious receivers.

Our colleagues are instructed to not authorize payments to countries which are unrelated to the transaction, unknown receivers and other such red flags.

**We gain our competitive advantages through strong performance not through unethical or illegal business practices.**

**Corruption exists – do not be a part of it, and report it if you see it.**

## **What this means for you**

- Do not agree with a competitor on important issues like price fixing, market sharing, or customer allocation etc.
- Do not exchange commercially sensitive information with competitors.
- We have a zero-tolerance policy towards bribery
- Gifts to employees of public authorities are never permitted.
- We prohibit “facilitation payments” i.e. are unlawful payments made in order to expedite a service that you are entitled to.
- You will never be punished in any way for not paying bribes or otherwise partaking in corruption.
- Discounts and bonuses should always be put explicitly into contracts.
- If you are presented with a doubtful gift, service or benefit it should be authorized by your manager before acceptance.
- Never accept any cash gifts or loans from outside parties or any representatives of such parties.
- Don’t attend events that lack connection to the business and don’t let the business partner pay for entertainment.
- Sharing, receiving, or exchanging certain information such as discounts, business plans, distribution and market forecasts could be prohibited even when it is informal, such as in conversation with a former colleague or friend.









# How we separate business activities from personal interest

Openness regarding conflicts of interest drives trust and demonstrates to partners and customers that we are caring, honest and reliable.

## **Conflict of interest**

At Nobia we respect the privacy of our colleagues, nevertheless, all our business relationships must be impartial. All business decisions must be taken in the company's best interests without consideration for personal relationships or advantages. Conflicts of interest between colleagues and the company must be avoided.

A conflict of interest can arise in different kinds of situations and can be understood as actual conflicts of interest, potential conflicts of interest and perceived conflicts of interest. To avoid these different kinds of conflicts and appearances of conflict openness and pre-approval are paramount. It is our policy that situations where a conflict can be perceived is enough to warrant action by whomever it concerns. A mere appearance of conflict can cause damage.

If a conflict of interest does arise, the colleague must inform his/her manager immediately. Everyone should refrain from taking part in any decision which involves parties to which he or she has any sort of conflict of interest. All colleagues must seek written approval from local People & Culture and relevant managers in accordance with the grandparent principle before conflicts arise. It is the manager's or People & Culture representative's responsibility to facilitate contact with regional management in cases where it is required.

Some conflicts of interest have to be approved by the Board of Directors and reported externally.

## **Employment of, buying from, and selling to family members and close personal friends**

Nobia strives to maintain a fair workplace free from special advantages due to family or other personal relationships. Therefore, the employment of family members or personal friends is subject to prior approval according to the grand- parent principle. Furthermore, a colleague must not be employed in any position where he or she has an influence on the family member's job. The above applies also to buying from and selling to family members or close personal friends.

## **Insider dealing**

While working at Nobia you may become aware of information which is not publicly available, and that likely would be considered relevant to an investor when deciding whether or not to invest in the Nobia share ("inside information"). If you are aware of inside information about Nobia, you may not on your own or on someone else's behalf buy or sell Nobia shares or other financial instruments that are linked to the share price of the Nobia share. In addition, a person in possession of inside information may also not recommend or induce another person to acquire or sell financial instruments to which the inside information relates.

Trading in the share when you have inside information or sharing it with others is illegal and can result in severe penalties for both you and for Nobia.



No one should disclose inside information if not explicitly entitled to do so under a confidentiality agreement.

#### **Communication and social media**

It is essential that our public communications are clear, accurate, consistent and responsible. Only authorized persons can talk to the media or members of the investment community; contact the Press Office or Investor Relations for advice.

We are all responsible and accountable for our own communication externally and internally. Colleagues shall be professional and polite and exercise caution and loyalty to Nobia when making statements or comments that can be related to Nobia or its business whether to colleagues, business partners, friends or other external parties. This applies to verbal and written communication through emails, traditional media or social media (e.g. Facebook, LinkedIn, X Instagram, TikTok).

If colleagues make external comments that may be construed as being related to Nobia or its business, he or she shall exercise caution and clearly state that such statements and comments are personal and do not reflect the view or opinions of Nobia or its management.

#### **Political contributions and activity**

We adopt a neutral position towards political parties and candidates. We make no payments or donations to political candidates or parties. Neither the Nobia name nor the company's resources may be used to promote the interests of political parties or candidates.

As an individual, you have the right to personally participate in the political process, including making personal political contributions. However, you need to make it clear that your personal views and actions are not those of Nobia.

**Your social posts and comments are of course your own, but remember that posts and comments are not anonymous and can negatively impact Nobia.**

## **What this means for you**

- Don't take other employment or engage in other external activities that can interfere with Nobia's interests.
- Disclose situations to your line manager that might create a conflict, or even the appearance of a conflict.
- Be transparent - don't participate in a process where you have a personal interest that influences, or may be perceived as influencing, your ability to make an objective decision.
- Make sure to get written pre-approval in accordance with the grandparent principle in case of a potential conflict of interest.
- Inside or otherwise confidential information must not be used for personal gain.
- Never hint to family, friends or someone else to buy or sell shares when you are in possession of inside information.
- Be professional, polite and respectful when communicating with others.
- Acting on behalf of Nobia in social media channels is only assigned to specific individuals.
- Remember, if you have to ask whether you are authorized to communicate externally, you most likely are not.





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# How we safeguard our assets

It is important that the integrity of our assets is protected.

## **Protection of company assets**

All of us have a responsibility in taking care of our assets and resources. These assets include both tangible and intangible assets, such as facilities, property, equipment, machinery, IT systems, information, corporate opportunities, and funds. Tangible assets such as machines must be operated with care in order to retain their value and expected lifespan. A responsible use of resources protects shareholder value and promotes growth, which benefits everyone in the organization.

## **IT & Intellectual property**

We allow personal use of IT and communications equipment, provided that it does not increase information security threats (i.e. increases in cybersecurity threats) or if the usage negatively affects the daily work or IT infrastructure (bandwidth or storage capacity etc.)

It also includes accessing websites that contain offensive or illegal material such as racist, pornographic or illegal drug websites. Such use of our IT assets is not allowed under any circumstances.

Our intellectual property – such as patents, know-how, design, copyrights, brands and trademarks are highly valuable. Therefore, they should be protected to maintain and further grow their value. Protection in this context means keeping the intellectual property safe from theft or infringement, as well as brand recognition, association and reputation.

All employees should follow all information security guidelines.

## **Confidential information**

Confidential and proprietary information includes all non-public information. This includes third party information that has been entrusted to us by. If disclosed, this information might be useful to competitors or harmful to us. Furthermore, any information that if disclosed risks placing Nobia at a competitive disadvantage, shall be treated as confidential and may only be disclosed to a colleague who needs the information to perform their work. This also applies after the termination of employment. It is further prohibited to discuss directly, or over the phone, confidential or other matters that could lead to a competitive disadvantage, in places or situations where such discussions could be overheard. The same applies to all e-mail or internet communication. Colleagues should not provide confidential information about Nobia except pursuant to a written confidentiality agreement.

Unwarranted sharing of confidential information is not allowed and can in some cases result in individual criminal and civil liability.

## **Accounting & Reporting**

The integrity of Nobia's record keeping and reporting systems is of utmost importance and to run the business we continuously make decisions based on various information sources within the organization. Therefore, colleagues must take special care to make sure that records are accurately and completely prepared and reviewed, regardless of whether they are for internal or external use. The accuracy of our books, records and filings to public or governmental authorities is essential to the company's ability to meet legal and regulatory obligations.



In addition to local requirements, the filings of Nobia AB as a listed company must comply with stock exchange requirements.

The trustworthiness of Nobia depends on this and failing to disclose accurate information can also lead to legal prosecution. Consequently, colleagues must apply accounting rules and controls, as described in the corporate manual, and follow company procedures for retaining and disposing of records.

#### **Data protection and privacy laws**

The collection, use, storage and international transfer of personally identifiable information about individuals is increasingly subject to regulation. Nobia respects the privacy of its colleagues, contractors, vendors, suppliers and consumers, and of other third parties with whom it does business. The group exercises appropriate and due care to legally ensure that sensitive personal information is not publicly disclosed.

#### **Building and fire safety**

Hazardous material and equipment must be stored according to applicable rules and policy. There should be clearly marked emergency exits. Exits must not be blocked and should be well lit. All colleagues shall receive information about the safety arrangements such as emergency exits, fire extinguishers, first aid equipment, etc. An evacuation plan should be displayed on each floor of a building. The fire alarm should be tested, and evacuation drills carried out on a regular basis.

#### **First aid and medical care**

First aid equipment must be available at appropriate locations, and at least one person in each location should be trained in basic first aid. Heart defibrillators are considered common practice and should be present in our premises.

**Nothing is more important to us than  
the health, safety and security of our workforce and the  
communities in which we operate.**

## **What this means for you**

- When using our assets, such as company computers, keep storage of personal data to a minimum
- Remember that you represent Nobia when using e-mail, Internet and mobile devices provided by the Company and that activities can be monitored.
- If you bring our assets outside of our premises you must protect them from theft and misuse and timely return the assets.
- Respect the intellectual property rights of others.
- Protect the confidential information that suppliers, business partners and others share with us.
- Always maintain accurate and complete information and records
- Ensure that all transactions are properly authorized and supported with adequate documentation, e.g. reimbursement claims
- Regularly inspect fire and safety equipment to make sure it is functional.







# How we protect the environment, interact with the community and maintain long-term partnerships

## We aim to use materials and energy as efficiently as possible

### **Environmental protection**

At Nobia we appreciate the importance of the environment and climate and the integral role to be played by companies like us in shaping a more sustainable future.

We work actively to safeguard the environment and strive to reduce the environmental and climate impact of the company's activities, products and processes. We strive to mitigate the greenhouse gas emissions from operations, transportation and supply chain to contribute to the limiting of global warming in line with the Paris Agreement, meeting our Science Based targets for climate action. We strive to reduce our environmental impact by integrating environmental consideration to the value chain and to promote sustainable consumption by providing information needed for our customers to make sustainable choices. We communicate third party verified eco-labels, according to type I ISO-standard or life cycle assessment data aligned with European standard for building products (EN 15804+A2).

We shall meet legal environmental requirements and expect all our units to have the environmental permits and licenses needed for their operations. By systematic management we aim for continuous improvements, to meet targets and adherence to the precautionary principle. All colleagues are expected to support and take responsibility for our environmental performance.

We continuously seek ways to reduce the consumption of resources, such as energy, raw materials and water, prevent

pollution and waste and have noise levels at acceptable levels. Our aim is to improve the overall environmental impact of our operations and products along the value chain. We work with our partners to create a corporate culture that focuses on the environment and advocates an efficient use of resources.

### **Community and other stakeholder interaction**

Nobia shall act as a good corporate citizen wherever it operates and supports local and regional communities in appropriate ways. Our colleagues and operations are an integral part of local communities. We believe that we can make positive contributions to these communities by maintaining an open and transparent dialogue and by building lasting and long-term relationships.

When applicable, and where Nobia possesses relevant subject matter expertise, the company may contribute to consultations on legal developments at the national or EU level by providing data and sharing its experience. All such contributions must be coordinated with the Group Governance function to ensure consistency and alignment with the company's Code of Conduct.

### **Business partners and suppliers**

We build long-term relationships with suppliers that share our high ambition in sustainability. By promoting responsibility and transparency in our supply chain, we are contributing to a more sustainable future. We regularly monitor our suppliers' risks and sustainability performance via our Supplier Assessment Program.





We have developed a Supplier CoC that expresses our expectations on suppliers with regards to ethical, social and environmental requirements. Those engaged to act for or on behalf of Nobia must comply with our Supplier Code of Conduct. We also expect them to communicate the requirements outlined in our Supplier Code of Conduct to their sub-suppliers.

As we could be held liable for the wrongdoings of business partners engaged or instructed to act for or on behalf of Nobia, they should be carefully assessed and used only for legitimate business purposes, on arm's length, commercially reasonable terms. Consequently, we do not tolerate any forms of modern slavery, including forced, bonded or compulsory labour, or human trafficking

By being fair and ambitious we create long-term partnerships with our suppliers that help us optimize the value chain and increase efficiency.

#### **Responsible wood sourcing**

Wood is an essential part of our product line and we recognise the importance of natural ecosystems. We wish to contribute to the elimination of deforestation, reducing greenhouse gas emissions as well as protecting biodiversity and the rights and

livelihood of local communities by promoting sustainable and responsible forestry.

We undertake due diligence to assess and mitigate risks of illegal and unwanted forest products entering our supply chain and we strive to promote the provision of timber from certified sustainable sources even beyond our direct operations.

We strive to engage with stakeholders and enhance the awareness about wood from sustainable sources. Our ambition is to work further and beyond legal compliance.

**We aim to use  
materials and energy  
as efficiently as  
possible**

## What this means for you

- Always adhere to instructions and local routines, to prevent health and safety- or environmental incidents and to ensure legal and Nobia code of conduct compliance.
- Inform management if instructions and/or training leave room for improvement.
- Work systematically to reduce inefficiencies.
- Use energy efficiently.
- Ensure climate consideration in all business travel by following our Travel Policy.
- Work together with our business partners to identify areas that support our sustainability goals.
- Act with a long-term perspective
- Apply a life cycle approach when assessing and prioritizing measures to make products more sustainable
- Ensure a constructive dialogue with local stakeholders.







# How you contact us

**How do I raise a concern?** To express a concern, you can:

- Talk to your manager, or your manager's manager.
- Talk to a relevant functional group, like People & Culture, Finance, or Corporate Governance.
- Access the Nobia Group SpeakUp at: [www.nobia.com](http://www.nobia.com) under "Sustainability/responsible-sourcing" or on KitchNet.
- Dial in by using the numbers displayed in public areas or on KitchNet
- Write a letter to the EVP People & Culture or Head of Corporate Governance at:  
EVP People & Culture/  
Head of Corporate Governance Nobia AB Bleholmstorget  
30 E7 SE-11164 Stockholm, Sweden

## **Can I report anonymously?**

Yes, as long as anonymous reports are permitted by local law. However, we encourage you to identify yourself when making a complaint. This allows the company to obtain all facts, properly investigate your report, and enter into a confidential dialogue with you. Even if you identify yourself, every effort will be made to keep your identity strictly confidential within the company.

## **What happens after I raise a concern?**

Once you make a report, we will investigate the situation and take appropriate actions. If you raise a concern in good faith, we will not tolerate any retaliation against you. This is true regardless of the outcome of the investigation.

## **The main international ethical guidelines supported by Nobia are:**

United Nations International Bill of Human Rights  
[www.un.org](http://www.un.org)

International Labour Organization Declaration on Fundamental Principles and Rights at Work  
[www.ilo.org](http://www.ilo.org)

United Nations Global Compact, Nobia is a member of UN Global Compact since 2020.  
[www.unglobalcompact.org](http://www.unglobalcompact.org)

OECD's Guidelines for Multinational Enterprises  
[www.oecd.org](http://www.oecd.org)

Nobia's Sustainability reporting is aligned with legal requirements and follows the GRI – Global Reporting Initiative – guidelines  
[www.globalreporting.org](http://www.globalreporting.org)

## **Contacts**

EVP People & Culture [cecilia.forzelius@nobia.com](mailto:cecilia.forzelius@nobia.com)

Head of Investor Relations: [tobias.norrby@nobia.com](mailto:tobias.norrby@nobia.com)

Nobia AB  
Bleholmstorget 30 E7  
SE-11164 Stockholm, Sweden



**Early reporting can help resolve an issue quickly and minimize harm.**

# Relevant Nobia Group Policies & Guidelines:

1

## Our People

- People & Culture Policy
- Workplace Policy
- Equality & Diversity Policy
- Travel Policy
- Recruitment Policy
- Hybrid Work Guideline

2

## How we conduct our business

- Anti-Bribery Policy
- Competition Law Policy
- Gifts & Entertainment Policy
- Information Security Policy
- Acceptable Use Policy
- Indirect Material Policy

3

## How we separate business activities from personal interest

- Insider Policy
- Communication Policy
- Conflict of interest Policy
- Finance and accounting manual
- Travel Policy

4

## How we safeguard our assets

- Data Protection Policy
- Health & Safety Policy
- Communication Policy
- Treasury Policy
- Credit Policy
- Internal Control over Financial Reporting Policy
- Enterprise Risk Management Policy

5

## How we protect the environment, interact with the community and maintain long-term partnerships

- Modern Slavery Policy
- Environment & Climate Policy
- Supplier Code of Conduct
- Wood Policy
- Tax Policy



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