

# The Nordomatic Code of Conduct

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## The Nordomatic Code of Conduct

The Nordomatic Code of Conduct establishes the key principles for all Nordomatic operations and all employees.

The Nordomatic Code of Conduct is part of the terms of employment at Nordomatic and will complement your employment contract.

The Nordomatic Code of Conduct supports our company values and is supplemented by Nordomatic policies, rules, and guidelines.

The principles in this Code address topics like:

- ✚ Personal Conduct of Employees
- ✚ Anti-Corruption and Bribery
- ✚ Compliance with Competition Laws
- ✚ Business Partner Relations
- ✚ Global People Standards
- ✚ Corporate Responsibility and Sustainability
- ✚ Corporate Policies
- ✚ Reporting and Violations

**Our vision is to be the Global Impact Pioneer – fighting for the future of our planet.**

**We build on TRUST**  
**We take ACTION**  
**We deliver VALUE**

## About the Code of Conduct

The Code of Conduct (referred to as the Code) summarizes our most important corporate principles related to business ethics and environmental performance. This Code defines how we do business and how we behave as employees. We have a one-company approach, meaning we operate according to our values, policies, and principles in all areas.

All Nordomatic policies, regarded as an integrated part of the Code, can be found on the intranet. In case of conflict between the Code and Nordomatic Internal Policies, manuals, and guidelines, the Code will prevail.

An updated and prevailing version of the Code will be available on the intranet and the Nordomatic website.

Nordomatic will distribute this Code to employees upon the commencement of employment. All staff must acknowledge, in writing, that they have read, understood, and agree to comply with the Code.

## Personal Conduct of Employees

Employees must comply with applicable laws and regulations.

Nordomatic expects its employees to live by our company values: We build on trust, we take action, and we deliver value. Where no legislation or rules govern personal conduct, employees must exercise sound judgment and due care.

Employees must avoid activities that conflict with Nordomatic's interests and are obliged to disclose potential conflicts of interest to their managers. "Conflict of interest" includes personal or financial interests that could influence decision-making or compromise impartiality.

Colleagues, customers, and other business partners must be treated with dignity, respect, fairness and inclusion.

Discrimination and harassment, including sexual harassment, are unacceptable.

Nordomatic employees shall perform their work without the influence of alcohol or drugs.

When in doubt, employees should raise questions with a manager or another responsible staff member.

## Anti-Corruption and Bribery

Nordomatic is against any form of corruption and bribery and is committed to combating such practices.

Nordomatic competes for business on fair terms and solely on the merits of its services.

Regardless of local practice, personal payments, kickbacks, or bribes between Nordomatic and customers, suppliers, or public servants are strictly prohibited.

Any gifts or entertainment given or received as part of Nordomatic's regular business interaction with customers, suppliers, and other third parties must not be intended to secure an improper advantage. They shall be appropriate under the circumstances, reasonable in value, and adhere to the principles and limitations set out in our **Policy for Anti-Bribery and Corruption**.

## Compliance with Competition Laws

Compliance with all applicable competition rules and regulations lies at the heart of Nordomatic's business practice.

Nordomatic does not fix prices, allocate services, or divide markets with competitors.

Nordomatic does not collude on tenders with competitors.

Nordomatic does not share information or discuss competitive issues (such as pricing, discounts, bonuses, sales terms, etc.) with competitors.

## Business Partner Relations

Nordomatic requires its suppliers to comply with the Nordomatic Code of Conduct and ensures that customers and other business partners are familiar with it.

The Nordomatic delivery will meet agreed-upon standards for quality, health, safety, environment, diversity, and inclusion at customer sites.

Customer privacy is respected, and applicable data is protected. All employees must maintain confidential information and shall not disclose any customer information, directly or indirectly, to anyone unauthorized. For further information on confidentiality, please visit the employment contract.

Customer complaints are addressed effectively and considered a valuable contribution to constantly ensuring high service levels.

## Global People Standards

Nordomatic ensures proper working conditions for its employees, including appropriate health, safety, and well-being standards and a diverse and inclusive culture.

All employees are entitled to fair and equal treatment; Nordomatic tolerates no form of discrimination against employees in respect of race, colour, nationality, religion, creed, citizenship, familial status, marital status, civil union status, domestic partnership status, age, national origin, ancestry, physical or mental disability, affectional or sexual orientation or preference, family care status, sex (which includes sexual harassment, and harassment based on, pregnancy, childbirth, or related medical conditions), gender identity or expression, atypical hereditary cellular or blood trait of any individual, genetic information, veteran's status.

Nordomatic respects the freedom of association and the right to collective bargaining; all employees have the right to join and form trade unions.

Nordomatic prohibits the use of forced, compulsory, or trafficked labour or anyone held in slavery or servitude.

Nordomatic does not support child labour.

Nordomatic offers adequate wages that – as a minimum – comply with local agreements and regulations.

All employees are offered training opportunities relevant to the function they perform.

Nordomatic respects employee privacy and protects applicable data accordingly.

## Corporate Responsibility and Sustainability

Nordomatic acts as a good corporate citizen in all societies in which we operate.

Nordomatic respects, supports, and promotes human rights as stated in the United Nations Declaration of Human Rights and the International Labour Organisation's Core Conventions.

Nordomatic is committed to complying with the United Nations Guiding Principles on Business and Human Rights.

Nordomatic is committed to more of the UN's Sustainable Development Goals 2030.

Nordomatic is committed to reducing greenhouse gas emissions related to our operations and continuously reducing adverse environmental effects of its operations.

Nordomatic reflects its Environmental, Social, and Governance (ESG) commitments in all dealings with customers, employees, suppliers, and other stakeholders.

## Corporate Policies

To ensure good corporate governance, Nordomatic has adopted several compliance policies and standards, which can be found here: [Group Intranet - Home](#) or [Nordomatic - Change Today. Impact Tomorrow](#)

## Protection and Proper Use of Company Assets

Employees should endeavour to protect Nordomatics assets and ensure their efficient use. Any suspected incident of fraud or theft should be immediately reported for investigation.

## Reporting and Violations

If you are an employee, customer, business partner, or other stakeholder and believe there has been a breach of the Code, our policies, or relevant laws and regulations, we encourage you to speak up.

As an employee, depending on the nature and seriousness of the concern, you can address it first with your manager, local People & Culture, or Country Director.

If the issue remains unresolved and falls under the following categories, you can make a confidential and/or anonymous report online at WhistleB. WhistleB is an external service that handles sensitive matters. Here, you can feel safe reporting severe deviations, such as:

- ✚ Violation of the Nordomatic Code of Conduct
- ✚ Employee misconduct (including sexual harassment, discrimination, unfair preferential treatment, mobbing, and/or non-compliance with policies and guidelines).
- ✚ Internal fraud (including but not limited to bribery, corruption, and conflict of interest).
- ✚ External business integrity violations (including bribery, corruption, conflict of interest, collusion, coercion, and compliance breaches).
- ✚ Other significant risks (breaches of local/national/international laws or regulations; significant reputational risk for Nordomatic and/or our related parties).
- ✚ Corporate conduct (administrative, contractual, client-facing, communication, reporting or other matters).

Your case will be handled under complete confidentiality, and WhistleB will report the deviation to the chairman of the Nordomatic Board and the Group Head of People and Culture.

You will find the Whistle Blower Channel here: [Group Intranet - Home](#)

All reporting in our Whistleblowing channel can be submitted anonymously, and employees who speak up will not be retaliated against.

## Auditing

Nordomatic will conduct periodic internal audits of relevant company operations to help ensure the company's continued compliance with applicable laws and this Code. All employees must cooperate with - and never interfere with or obstruct - such audit activities or company investigations.

## Acknowledgement

I have received and read the Code and understand my obligations and Nordomatic's requirements and expectations. I agree to comply with the Code and its integrated documents as a condition of my employment.

By integrated documents, we refer to the following internal policies:

- ✚ Anti-bribery and Corruption
- ✚ Cyber Security
- ✚ Diversity & Inclusion
- ✚ GDPR and Data Protection
- ✚ Health & Safety
- ✚ Sustainability

I am accountable for following the Code, and failing to do so might result in harmful situations for the company and me as an employee. Failure to follow this Code may result in disciplinary action, including termination of my relationship with Nordomatic.

Employees visiting and working at customers' sites will adhere to the customers' policies and procedures.

Signed:

Print Name:

Date:

## Key Messages

**The Code of Conduct establishes key principles for all Nordomatic operations and employees. The Code defines how we do business and how we behave as employees.**

- ✚ We comply with applicable laws and regulations.
- ✚ We steer by our company values.
- ✚ We avoid conflicts of interest.
- ✚ We comply with applicable competition rules and regulations.
- ✚ We treat all with dignity, respect, fairness and inclusion.
- ✚ We do not discriminate or harass in any way.
- ✚ We do not tolerate any form of corruption or bribery.
- ✚ We ensure proper working conditions for our employees.
- ✚ We respect freedom of association and the right to collective bargaining.
- ✚ We act as a 'good citizen' in all societies where we operate.
- ✚ We report any breach of the Code, our policies, or relevant laws and regulations. All are encouraged to speak up.