

NTI Group Code of Conduct For NTI Suppliers and Business Partners

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Background and purpose

It is NTI's mission to help our customers develop better, and more sustainable designs and constructions by delivering high quality digital solutions and services. We are committed to conducting our business with the highest degree of respect for social, environmental, and ethical business standards. We require our Suppliers and Business Partners to uphold the same values and share our commitments to these standards.

We expect our Suppliers and Business Partners to demonstrate responsible business conduct by establishing processes to assess risks of adverse impacts and to implement measures to prevent, mitigate, and remediate adverse impacts on the areas covered by internationally agreed principles for sustainable development. These include the UN Global Compact principles, the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Meeting the minimum standard for responsible business conduct is distinct from legal compliance. Business Relationships are always expected to comply with the laws where they operate.

The purpose of this Code of Conduct is to ensure that all Suppliers and Business Partners working for NTI are informed of NTI's expectations and requirements and can demonstrate it upon request.

NTI Suppliers and Business Partners are required to take reasonable steps to ensure that this Code of Conduct is communicated throughout their organizations and to make this Code available to their employees and throughout their own supply chain.

Scope and Implementation

The NTI Code of Conduct for Suppliers and Business Partners sets out minimum requirements for all NTI's Suppliers and Business Partners.

Where the standards of this Code of Conduct differ from local and national laws, we expect our Suppliers and Business Partners to apply the stricter rules. NTI's Suppliers and Business Partners must strive to act responsibly in all aspects of their local, national, and global communities, including in the business, political, environmental, and beneficent activities in which they participate.

Suppliers and Business Partners are expected to implement systems to demonstrate compliance with and continuous improvement to the principles and standards, as stated in this Code and with other applicable requirements.

Where specified in contracts, NTI shall retain audit and inspection rights to verify compliance.

Human and Labour rights

NTI's Suppliers and Business Partners are required to respect all applicable laws, regulations and international standards related to labour practices and protection of human rights including the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions.

Health and safety

Suppliers and Business Partners are expected to provide a safe and healthy working environment for employees and others who are on a Supplier or Partners site. Suppliers and Business Partners must ensure management of hazards and risks associated with their operations, including the provision of adequate protective equipment. They must ensure continuous training of their employees about safety practices in the workplace and support workers' engagement, including empowering workers to raise any unsafe practice or condition without fear of reprisal.

Collective bargaining and right to associate

NTI requires its Suppliers and Business Partners to respect the rights of their employees to associate freely, join or not join trade unions and/or workers' councils, and engage in collective bargaining in accordance with national laws and international conventions.

Wages, benefits and working hours

Work should be organized so that the rights of employees to a private life and leisure time with their family are respected. Suppliers and Business Partners shall ensure that their employees' pay and benefits for work within regular working hours are sufficient to cover their basic needs and as a minimum, correspond with the statutory or collectively agreed minimum pay. Suppliers and Business Partners must comply with appropriate working hour requirements including overtime, breaks, and rest periods - as established by national law, relevant collective agreements and international standards, standards for paid sick leave, paid annual leave, and paid parental leave. Suppliers and Business Partners must adhere to social insurance regulations.

Non-discrimination, harassment, and equal opportunities

NTI requires that its Suppliers and Business Partners ensure equal treatment of its employees and refrain from discrimination in any form. Suppliers and Business Partners shall commit to a workplace free of harassment and abuse, and not use, or permit the use of, corporal punishment or other forms of mental or physical coercion, sexual harassment, or abuse, nor execute threats of

such treatment. NTI encourages Suppliers and Business Partners to promote inclusion and diversity among its workforces.

Child labour and young workers

Suppliers and Business Partners shall not use child labour. The employment of young workers should respect the age limits established by ILO.

Forced or bounded labour

Suppliers and Business Partners shall not use forced labour, bonded labour, forced overtime work, forced prison labour and/ or trafficked workforce. Employment should be freely chosen and employees free to leave after reasonable notice is served. Suppliers and Business Partners shall not require their employees to retain their identification papers, deposits nor use repayment of debts through work.

Environment

NTI seeks to reduce the adverse impacts of its business activities on the environment. We expect Suppliers and Business Partners to take steps to reduce their environmental impacts as well. At a minimum, we require that our Suppliers and Partners comply with all applicable environmental laws, regulations, and maintain the necessary registrations, permits and licenses.

Ethical business practices

Corruption and Bribery

NTI does not tolerate any corrupt practice and requires its Suppliers and Business Partners to comply with the anticorruption and anti-bribery laws and regulations that govern operations in the countries in which they do business as well as internationally applicable anti-corruption laws. Suppliers and Business Partners should avoid facilitation payments and work towards their elimination.

Anti-trust and competition laws

NTI's Suppliers and Business Partners are required to comply with all applicable anti-trust and competition laws and regulations.

Foreign trade controls

Suppliers and Business Partners must adhere to applicable national and international foreign trade control laws pertaining to business transactions with countries, companies, and persons

(sanctions), and the transfer of goods and services, software, or technology between countries (export controls).

Data Privacy

Suppliers and Business Partners must respect the rights to privacy and data protection of their employees and of individuals they cooperate with. They must adhere to all relevant data privacy laws and comply with contractual requirements on confidentiality and information security.

Confidentiality

Suppliers and Business Partners shall ensure to maintain confidentiality and safeguard proprietary information. Such information may only be used in accordance with agreement with NTI and the applicable legislation hereon.

Raising a concern

If you believe that an NTI employee, anyone acting on behalf for NTI or someone associated with one of NTI's Suppliers and Business Partners, is acting unethically, improperly, or illegally you should report your concerns to the NTI Group management. When reporting, you should provide as much information as possible so that we can fully investigate your report. NTI will support all who report violations or have concerns.

Partner accountability

It is the responsibility of each Supplier and Business Partner to ensure that its employees and representatives understand and comply with this Supplier and Business Partner Code of Conduct.

NTI expects its Suppliers and Business Partners to implement safe internal reporting channels so that any concerns such as legal or ethical issues, can be brought up and investigated in a diligent manner while providing required whistleblower protection. Suppliers and Business Partners shall also take action to prevent, detect, and correct any retaliatory practices.

Consequences of non-compliance

NTI reserves the right to request and obtain further information and documentation of business relationships' compliance with this Code of Conduct. If the business relationship does not meet the expectations outlined in this Code of Conduct NTI reserves the right to terminate its contract.