

# NCAB's Code of Conduct for suppliers

## Purpose

NCAB Group is a global producer of printed circuit boards, PCBs. Our vision is to be “The number 1 PCB producer wherever we are”. This means that we must apply a responsible approach in everything we do, socially, environmentally and ethically and what we also expect our suppliers to do. According to NCAB Group’s sustainability policy and internal Code of Conduct, NCAB aims to have a long-term and trustful relationship with its stakeholders including employees, customers, suppliers and other third parties who are involved in the operations. Hence, NCAB encourages an open and transparent dialogue relating to sustainability issues with all of its stakeholders.

The purpose of this Supplier Code of Conduct is to define the basic sustainability requirements for NCAB Group’s suppliers. All NCAB’s suppliers are obligated to implement the principles of the Supplier Code of Conduct and NCAB expect its suppliers to implement the requirements further on in the supply chain.

To ensure compliance, NCAB reserves the right to carry out reviews and audits on its suppliers and expect them to cooperate in a transparent manner. If the Supplier Code of Conduct is not met, corrective measures need to be taken. NCAB will follow-up and verify the progress on a regular basis and encourages a dialogue between parties. However, should the Supplier Code of Conduct be repeatedly and severely violated the future cooperation with NCAB may be negatively affected.

This Supplier Code of Conduct is based on UN Global Compact (<http://www.unglobalcompact.org>).

If you have any questions, please do not hesitate to call your NCAB Group contact.

## **Business ethics and principles**

### *Legal compliance*

NCAB Group's suppliers shall comply with all the applicable laws and regulations in all locations they conduct business. The principles of the Supplier Code of Conduct shall be used as guidelines if such laws do not exist. In addition to complying with all applicable legal and regulatory requirements, NCAB Group's suppliers are expected to act in accordance with high standards of business ethics and principles. We encourage our suppliers to work and comply with recognized management systems to meet these requirements.

Suppliers agree to protect the confidentiality of confidential information concerning NCAB Group's business partners and customers, and other information on NCAB Group's business operations. NCAB Group's suppliers shall compete fairly and ethically in all other respects as well.

### *Transparency*

All suppliers agree to be fully open and transparent regarding changes to (i) the product / service that they provide to NCAB Group or (ii) changes to their facilities including ownership and operational set up. This is especially critical if any change has the potential to influence our ability to comply with customer demands and expectations, or if any such change has the potential to damage our reputation and / or pose a risk to our business operations. These changes may have come into effect by design or as a consequence of other factors.

### *Anti-Corruption*

The highest standards of integrity are to be expected in all business interactions. It is prohibited that the supplier engages in any form of corruption, including bribery, fraud, extortion, money laundering, and improper payments (proposed or actual) and favors to or from employees or organizations.

### *Intellectual property*

NCAB Group's suppliers shall be aware of any information received from NCAB's customers and from NCAB itself, whether in electronic or other format, and which is used to support the manufacture and/or procurement of their product, is the sole property of the customer. The supplier shall recognize and agree that this information is strictly confidential and shall not be reproduced, shared, or transmitted to a third party without the written permission of said customer.

### *Human rights*

NCAB Group's suppliers shall support and respect internationally proclaimed human rights and freedoms. NCAB Group's suppliers shall make sure that they are not engaged in human rights abuses.

Conflict minerals are minerals that are linked to systematic violence and human rights abuse in certain conflict areas. NCAB Group has a policy on a conflict-free mineral supply chain. NCAB Group's suppliers shall therefore ensure that no conflict minerals are being use in their production.

## **Labour and working conditions**

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The employees of NCAB Group's suppliers understand their employment conditions. Working weeks are not to exceed maximum set by local law. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages.

NCAB Group's suppliers shall confirm that their employees have the right to healthy and safe working condition in compliance with all applicable laws and regulations. The supplier shall provide appropriate health and safety training and equipment to their employees. At a minimum, suppliers shall provide employees with access to first aid, personal protective equipment, noise protection, adequate ventilation, proper lighting, emergency exits, firefighting equipment, clean toilets and drinking water.

### *Harassment and non-discrimination*

NCAB Group's suppliers shall treat their employees with respect and do not tolerate any involvement in non-professional behavior or complicity concerning harassment under any circumstances or for any reason. All kinds of discrimination such as discrimination based on race, age, religion, political opinion, nationality, ethnic background, social origin, disability or sex orientation etc. Threats of violence, corporal punishment, physical or verbal abuse or other unlawful harassment are prohibited.

*Forced labour*

NCAB Group's suppliers must not use forced labour, regardless of its form. This prohibition includes debt bondage, trafficking and other forms of slavery. Employees are free to leave their employment after reasonable notice as required by national law or contract. Employees are not required to lodge deposits of money or identity papers with their employer.

*Child labour and young workers*

NCAB Group's suppliers shall not accept employment of children. In no case shall the supplier employ children who are below the minimum legal age for employment. The minimum age is the age of completion of compulsory schooling, or not less than 15 years (or 14 years where the law of the country permits). The supplier's employees under the age of 18 cannot perform any hazardous work.

*Freedom of association*

NCAB Group's suppliers shall recognize and respect employees' freedom of association. They may freely choose to join, or not join, any trade-union or similar external organizations. The suppliers shall also recognize employees' right to collective bargaining.

**Environmental responsibility**

NCAB Group's suppliers shall support a preventive approach to questions concerning the environmental challenges and undertake initiatives to environmental responsibility. NCAB Group also encourages its suppliers to development and diffusion of environmentally friendly technologies. At a minimum, suppliers shall comply with all applicable environmental laws and regulations.

*Supplier affirmation*

I have read and understand the NCAB Group's Code of Conduct. I will take appropriate steps to ensure effective compliance with this Code and with the laws, regulations and other relevant policies that apply.

If I have a concern regarding a possible violation of this Code or the law, I will report my concern immediately to the Group Sustainability Director at NCAB Group.

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Signature

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Date

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Company name