

# Supplier Code of Conduct

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## 1 Introduction to the Code

Sustainability is to be part of everything we do. Our aim is to ensure that our products and services are being developed, manufactured, and delivered with the highest possible sustainability standards, all according to our customers, suppliers, and employee's expectations.

We are committed to sustainability in all business activities and intends to do business with highest ethical standards and transparency. With the purpose of ensuring a responsible conduct, Nodica Group's Supplier Code of Conduct (the "Code") summarizes the requirements we have on our suppliers.

The Suppliers Code of Conduct is based on internationally agreed upon standards, primarily the Ten Principles of the UN Global Compact, the general concepts expressed in the International Labour Organization (ILO) conventions, and the UN Declaration of Human Rights.

Beyond this Supplier Code of Conduct all suppliers are expected to comply with applicable national laws, regulations, and standards.

**This Supplier Code of Conduct applies to all suppliers and intermediaries of both products and services to the Nodica Group.**

## 2 The Nodica Group\*

**We empower organizations to make new discoveries and drive progress in the fields of medical technology, scientific research, and various industries.**

With a legacy of expertise and innovation, Nodica Group has emerged as a global pioneer in developing, designing, and producing sustainable, premium power solutions for medical technology, science, and industry applications.

Our products and solutions prioritize the use of the latest technology to enhance quality, performance, and sustainability of our customers applications. We strive to foster new discoveries and support the development of innovative, sustainable solutions across various fields. Today, we power applications such as radiotherapy, cargo scanning, radar, and particle physics.

Nodica Group continues to push the boundaries of technological advancement, setting the stage for an even more dynamic future.

\*For the purpose of this policy, "Nodica Group", "Nodica" or "Group" all refer to Nodica Group AB and all its subsidiaries.

### 2.1 Our Values

#### Innovation

Innovation is the foundation for our business and the main reason why we can provide world-class products and solutions. From the start, there has been a strong willingness to take our technology to new levels. But it's not only about groundbreaking product inventions. We are driven by constant development and to always challenge ourselves in all aspects of our business.

#### Collaboration

Collaboration is one of our values upon which we commit to base all our relationships. Our customers and partners are our primary source of inspiration and a prerequisite for our innovative culture. Deep knowledge about our customers' and end customers' challenges, needs and market conditions set the standards for our own development. All disciplines within the company work closely together and in a spirit of teamwork to achieve common goals.

#### Commitment

When customers choose Nodica Group they should feel confident that we do our utmost to meet or exceed their expectations and deliver products and services with high quality, including promised product quality, performance, and functionality as well as on-time delivery and good support. This is ensured through good

planning, well-documented processes, work routines, and quality controls. Our ambition is to always plan well, do things right from the start, eliminate risks and keep deadlines.

### **3 Business Ethics**

#### **3.1 Bribery and Corruption**

The supplier complies with local laws and international anticorruption conventions and shall not engage in, or cause Nodica Group to engage in, any form of corrupt practices, including extortion and bribery. Suppliers shall ensure that payments, gifts, or other commitments to customers (including Nodica Group's employees), government officials and any other party follow applicable anti-bribery laws. We have zero tolerance against any form of corruption, bribery, and money laundry.

#### **3.2 Representation and gifts**

We appreciate good working relations, but gifts or promotions should never influence business decision. Therefore, it is key for Nodica Group to bear our own costs. We consider moderate representation at lunches and dinners for business purposes legitimate, but do not accept event fees, or expenses for travel and lodging to be covered by our suppliers. We do not accept gifts from suppliers over the corresponding value of 1000 SEK.

#### **3.3 Confidentiality and Competition law**

Confidential information concerning Nodica Group or Nodica Group's customers' operation may only be used in the purpose it is intended. All companies have a responsibility to not share information that can hurt Nodica Group with any outside parties.

The supplier respects and complies with applicable competition laws and regulations and establishes systems to prevent competition law infringements. Nodica Group employees and suppliers shall not participate in any collaboration or behave in any other manner that could be perceived as restricting competition. Nodica Group employees and suppliers are aware that the information, working documents and systems provided by Nodica Group, or which are developed based on information provided by Nodica Group, and which are not public, must be treated as confidential.

Nodica Group employees and suppliers show caution in handling the company's documents and information. All suppliers are responsible for their employees and making sure that the guidelines are followed. If electronic services are used for information exchange, only secure servers or cloud services are allowed.

### **4 Fair working conditions and Human rights**

#### **4.1 Compensation**

All employees and consultants are entitled to a fair salary. Wages, benefits, and overtime compensation shall at the very least comply with national legislation, industry standards and collective agreements.

#### **4.2 Working Hours**

Working hours, breaks and vacations must comply with national legislation and agreements as well as international agreements. In addition to reasonable working hours, disciplinary measures such as salary deductions are not permitted.

#### **4.3 Health And Safety**

Suppliers are responsible for ensuring that their employees and consultants are provided a safe and healthy workplace. All suppliers should take appropriate action to prevent and manage potential workplace accidents and illnesses.

#### **4.4 Freedom of Association and Collective Bargaining**

All suppliers' employees shall be free to exercise their legal rights to form, join or refrain from joining organizations representing their interests as employees. The employees' right to collectively bargain shall be respected.

#### **4.5 Diversity and Inclusion**

Suppliers must ensure that human rights and labor laws are respected and complied with. Personal dignity, privacy, and rights of everyone must be respected.

Diversity and cultural differences shall be respected, suppliers are not allowed to discriminate against employees on basis of gender, nationality, ethnicity, pregnancy, sexual orientation, or political opinion.

#### **4.6 Child Labor Rights**

Suppliers shall work actively to prevent child labor, modern slavery, and human trafficking. The minimum age of employees shall be 15 years if no other legislation is in place. For authorized minors, management is responsible for providing age-appropriate working conditions, hours of work and wage, in compliance with applicable law.

#### **4.7 Healthy Working Environment**

Employment shall be voluntary, and workers shall have the right to enter or terminate their employment freely.

Suppliers shall provide a safe and healthy working environment and take appropriate action to prevent potential workplace accidents and illnesses. The workplace should be free from harassment and abuse in all forms; physical, mental, and sexual.

### **5 Environment and Sourcing**

#### **5.1 Environmental Laws and Legislations**

Suppliers shall comply with national and international environmental laws and legislations. Prioritizing and ensuring a strategy intended to work for the environment and counteracting climate change should be a priority for suppliers.

#### **5.2 Cradle to Grave**

Suppliers shall do a life cycle assessment, ensuring that products are sustainably sourced and produced. Suppliers shall assess significant environmental impact of operations and take appropriate actions that reflect Nodica Group's environmental responsibility.

#### **5.3 Recourse Consumption**

Suppliers are required to work actively to reduce their water and energy consumption. Suppliers shall as far as possible choose fuel-efficient and low emission vehicles for transportation to reduce adverse environmental impact.

#### **5.4 Sustainable Waste Management**

Suppliers shall have in place, or work to establish, a procedure for waste management. The procedure shall include identification, safe handling, storage, transportation, utilization, and disposal of waste in accordance with the applicable legislations and avoid materials and methods posing environmental and health risks.

#### **5.5 Responsible sourcing**

Suppliers shall make conscious choices of the origin and source of the materials in products, parts or components supplied to Nodica Group. It must be ensured that the sourcing does not directly or indirectly contribute to human right abuse and/or environmental damage in conflict-affected and high-risk areas.

Suppliers shall comply with the requirement of following REACH legislation and RoHS directive when producing or distributing products to Nodica Group.

Regarding conflict minerals, including the metals tantalum, tin, tungsten, and gold, caution is expected for minerals from conflict-affected and high-risk areas. Nodica Group refers to the OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing, Paris.

## 6 Compliance

Ensuring awareness of, and compliance with, relevant legal requirements is the baseline for complying with the Suppliers Code of Conduct. Suppliers shall comply with all applicable laws and legislations relevant for their operations and performance. Business must be conducted in full compliance with all applicable antitrust and fair competition laws.

All business relations between Nodica Group and our suppliers must be based on honesty, trust, and cooperation. The supplier co-operates with Nodica Group in a transparent manner, provides Nodica Group with any information that Nodica Group may request regarding the standards in the Suppliers Code of Conduct, including completing self-assessments and granting Scandinavia's employees, or a third party of Scandinavia's choice, access to relevant premises and information to conduct on-site audits of the suppliers and sub-contractors' sites and facilities.

We expect our suppliers to be updated on and comply with the content in this Suppliers Code of Conduct. If the requirements of this Code are stricter than local laws, the supplier shall follow the Suppliers Code of Conduct.

Suppliers are responsible for being updated about new or revised requirements in future revisions of the Suppliers Code of Conduct.

### Suppliers shall:

- Comply with relevant legislation regarding human rights, labour rights, working conditions, health and safety, environment, tax, and anticorruption practices, as well as the requirements set out in this document, and obtain all legally required permits, licenses, and registrations.
- In cases where local laws or regulations provide a stronger protection than the requirements in the Suppliers Code, allow such local laws or regulations to prevail.
- Be aware of whether any domestic regulation or its enforcement conflicts with international human rights standards and strive to honor the spirit of universally recognized human rights.
- Communicate transparently. Provide correct and consistent information to its stakeholders in a timely manner and in accordance with applicable stock exchange rules.
- Be able to demonstrate their compliance with local legal requirements upon request.

**Supplier signature**

As a supplier to Nodica Group we sign this document to acknowledge that we meet these requirements and that we understand that they are an integral part of our business agreement.

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Company

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Name

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Title

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Date and place

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Signature