

## **Sustainability requirements for NRC Group's business partners /NRC Group Business Partner Code of Conduct**

We build and maintain sustainable infrastructure. From materials to maintenance, we provide our customers with everything they need to build railway infrastructure. We operate in compliance with legislation and the UN Global Compact principles, and we plan, manage and conduct our operations responsibly, taking into account the environment and acting with high ethical and moral standards. NRC Group also requires its contractual partners and those involved in their supply chain to act in a sustainable way.

This Code of Conduct is in addition to the NRC Group's Terms of Procurement applicable to all procurement contracts and is an integral part of any invitation to tender, contract or contractual activity and does not limit any other rights of the NRC Group under an invitation to tender or contract. NRC Group's contractors must hold their contractual partners to corresponding sustainability requirements and obligations when operating at NRC Group sites or in other activities.

Responsible supplier management is at the heart of our procurement function. Therefore, as part of our procurement activities we always ensure that our contractual partners meet our legal, financial, ethical and operational requirements.

### **Legal compliance and ethical business conduct**

The NRC Group's activities are based on full compliance with the law and adherence to the principles of ethical business conduct. We require our business partners to

- be responsible for the economic, social and environmental impacts of their activities,
- comply with legislation and our sustainability requirements not only in their own operations, but also in their supply chain, insofar as they relate to NRC Group's activities,
- ensure the confidentiality of sensitive information,
- comply with the rules on open, unrestricted competition and fight the informal economy,
- not become involved in corruption, money laundering, organised crime and offences against public finances,
- report to the NRC Group any non-compliance with the Code of Conduct they have identified in relation to the NRC Group's activities.

### **Occupational health and safety**

The safety and health of everyone working on NRC Group sites is of paramount importance and we are constantly working to prevent accidents. Our contractual partners must

- comply with occupational health and safety regulations and other binding obligations,
- provide a safe and healthy working environment for their employees and subcontractors,
- provide their employees with appropriate protective equipment and training,
- document and report accidents and incidents and participate in their prevention and investigation,
- commit to and promote the NRC Group's health and safety objectives.

### **Social sustainability**

Everyone involved in NRC Group's operations is treated equally and fairly. We require our business partners to

- comply with legislation on working conditions,
- respect collective agreements and allow their employees to organise freely and participate in collective bargaining,
- respect human rights and the principles of non-discrimination,
- ensure that no forced or compulsory labour or child labour is used in the supply chain,
- encourage their employees to report any observed social sustainability deviations and violations through the NRC Group's reporting channel insofar as they relate to NRC Group's activities.

**Environmental sustainability**

NRC Group has set targets to reduce the adverse environmental impact of its operations. We require our contractual partners to

- comply with environmental legislation and regulations,
- reduce emissions, waste and other adverse environmental impacts from their operations,
- adopt more environmentally friendly policies and solutions,
- document and report any and all environmental accidents and incidents and participate in their prevention and investigation,
- commit to NRC Group's environmental objectives and their reporting and promotion.

**Quality and continuous improvement**

NRC Group builds and maintains future-proof and sustainable infrastructure. Our contractual partners must

- comply in all respects with what is agreed in the contract as regards quality,
- improve efficiency and prevent waste,
- ensure that the supply chain is also aware of the quality requirements as they apply to the NRC Group's activities,
- document and report any quality failures promptly, and contribute to their prevention and, for their own activities, to their correction,
- be committed to continuous improvement.

**Monitoring**

NRC Group employees responsible for contracting or working with contractors on NRC Group sites or other activities are responsible for briefing contractors on sustainable conduct. NRC Group monitors the sustainability performance of subcontractors, material suppliers and others working on behalf of the company in terms of compliance, occupational health and safety, environmental sustainability, and quality.

NRC Group's contractual partners and their subcontractors are subject to the metrics and evaluations related to monitoring activities, and NRC Group may audit its contractors and their subcontractors itself or through a third party. To this end, the contractor shall inform NRC Group without delay of all companies in its subcontracting chain upon request. Contractors and their subcontractors are obliged to provide NRC Group with the data and reports necessary to carry out measurements, assessments and audits. The contractors and their subcontractors shall bear their own costs for the metrics, assessments and audits.

If deviations or violations are detected during inspections, assessments or audits, corrective measures shall be planned in cooperation between the contracting parties and implemented without delay. If, despite mutual agreement, the problem is not rectified within a time frame agreed on, NRC Group has the right to terminate the contract and cancel or suspend the work.

If a contracting party otherwise breaches or fails to comply with its obligations as set out in these requirements, the contracting party shall immediately remedy its conduct or intervene in the conduct of its own contracting party on pain of termination of the contract by NRC Group with effect from the date specified.

This document sets out the general sustainability requirements that apply to all NRC Group activities. In addition to these, other, more specific requirements may apply.