

A blurred background image showing three people in a meeting or office setting. One person is in the foreground, slightly out of focus, while two others are in the background, also blurred. The overall scene suggests a professional environment.

Business Relationships Code of Conduct

Code of Conduct for Business Relationships

With this Code of Conduct (CoC) for Business Relationships RelyOn Nutec Holding A/S and subsidiaries (“RelyOn Nutec”) seeks to ensure that our business relationships, including suppliers and partners, demonstrate responsible business conduct in relation to managing adverse impacts on principles for sustainable development.

The Global Standard

The areas covered by this CoC are founded on international principles for sustainable development: human rights (including labor rights), the environment (including the climate), and anti-corruption. The principles are listed in the UN Global Compact and made operational through the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD).

Meeting the minimum standard for responsible business conduct as defined by the UNGPs/OECD is distinct from legal compliance. Business Relationships are always expected to comply with the law, wherever they operate. In addition, RelyOn Nutec expects all of our business relationships to meet the globally agreed minimum standard for responsible business conduct (UNGPs/OECD). RelyOn Nutec may levy additional, more specific requirements related to sustainable development, should circumstances require this.

Scope

The required management system shall, at a minimum, address adverse impacts on the human rights stated in the International Bill of Human Rights, including the core labour rights from the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work; significant adverse impacts on the external environment in relation to the areas addressed by the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement; and adverse impacts on anti-corruption, as related to the scope outlined by the United Nations Convention against Corruption.

Management Requirements

Meeting the global minimum standard involves managing adverse impacts in relation to internationally agreed principles for sustainability. The following elements of management system shall be met:

i. Adopt a Policy Commitment to Meet the Global Minimum Standard

The Policy Commitment of our business relationships shall:

- be approved at the most senior level of their company;
- stipulate their expectations of employees and business relationships;
- be publicly available and communicated both internally and externally; and

- be embedded in all other operational policies and procedures throughout their companies.

ii. Establish and Maintain a Due Diligence Process

Business Relationships shall establish a process for regular assessments of adverse impacts on the Scope (see above) to identify, whether they are at risk of causing or contributing to adverse impacts through their own operations or services. They shall then act to prevent or mitigate both actual or potential adverse impacts identified, and actions shall be tracked to ensure effectiveness. Business relationships are expected to communicate about this process (findings, actions taken, effectiveness indicators and ongoing status) to relevant stakeholders.

The due diligence of our business relationships includes, that they require from their own business relationships that they meet the global minimum standard as well. If a business relationship becomes aware of an actual severe adverse impact that it is linked to, the business relationship must use or build leverage to make the causing or contributing entity stop the impacts and prevent or mitigate re-occurrences.

iii. Provide for access to remedy

Where business relationships cause or contribute to actual adverse impacts, the business relationships should provide for access to remedy to those affected through legitimate processes (grievance mechanisms) and/or notify the appropriate authorities.

Implementation

This CoC applies to all our business relationships. They shall require from their business relationships to have similar and adequate processes in place. Our business relationships shall be able to document that they pose similar requirements (UNGPs/OECD) to their relationships. Our business relationships must maintain appropriate records to demonstrate compliance with the requirements of this CoC. Appropriate records include: Policy statement(s), documentation of due diligence processes, including operational-level impact assessments with transparent records on tracking effectiveness of specific actions, documented grievance mechanisms, and documentation of similar requirements to business relationships.

The level of documentation that we require from business relationships may vary according to size and sector. For small and medium-sized enterprises, we expect them to know their risks and manage them appropriately. They shall be able to share with us how they manage their impacts, if asked. However, we will not require documentation of impact assessments; except if located in conflict affected areas or with known risks of severe adverse impacts.

RelyOn Nutec implements the requirements outlined in this CoC as well. We are prepared to share our results with our business relationships. If it is the first time our business relationships meet these requirements, we will accordingly give ample time for implementation. We expect business relationships to develop and adopt a policy commitment within one year from the first time they received this CoC. We expect them to be able to show us impact assessments from sites in direct relation to us within two years.

This CoC forms the foundation for the collaboration between RelyOn Nutec and our business relationships. Should our business relationships not have implemented a management system in alignment with this CoC at the time of receiving it, an implementation plan should be developed and, if required, presented to RelyOn Nutec. We expect our business relationships at any time to be able to declare their stage of implementation in relation to the requirements contained in this CoC.

Should RelyOn Nutec's business relationships cause, contribute to, or be linked to *severe impacts*, our business relationships shall notify RelyOn Nutec immediately. The notification shall include an account of the actions to end the severe impacts and to prevent or mitigate their re-occurrence. If business relationships neglect to notify RelyOn Nutec of or to address severe impacts, or if they demonstrate lack of willingness to meet the international minimum standard, we reserve the right to end the business relationship immediately.

/December 19th 2022