NIL Technology ApS
Nymøllevej 85
2800 Kongens Lyngby
Denmark
www.nilt.com
VAT: DK 29310203

NIL TECHNOLOGY SUPPLIER CODE OF CONDUCT

NIL Technology (NILT) is a responsible company with an outspoken goal to do right when it comes to environment, health, and safety (EHS), Ethics, and Compliance committed to the UN Global Compact and its 10 principles of responsible business.

All suppliers to NILT including subsidiaries and affiliates, are expected to operate in accordance with the minimum requirements set out in this Code of Conduct. In addition to the requirements in this Code of Conduct, more detailed standards are set out in several areas in our policies and contractual clauses. Failure to observe this Code of Conduct will require corrective action. Non-compliance may be considered a material breach of the contract and may lead to termination.

We understand that ensuring standards are met at all times requires us to be in constant dialogue with our suppliers. We see this Code of Conduct as a tool in that process, giving our suppliers a clear understanding of our standards and expectations. It is also a tool to encourage dialogue and collaboration towards a common understanding and approach.

Suppliers are required to adopt a similar Code of Conduct to ensure these requirements are adopted across NILT's full value chain. Where there is conflict between the rules laid out in this Supplier Code of Conduct and local laws and regulations, the stricter of the two shall apply.

Audits and data sharing

Where specified in contracts, suppliers should allow audits to verify compliance with this code and other contractual obligations.

Upon request, suppliers are expected to share environmental, social and governance (ESG) data with NILT, including:

- Completing self-assessment questionnaires related to ESG topics
- Sharing greenhouse gas emissions attributable to NILT, ideally through product life-cycle assessments (LCA)
- Sharing waste, water and energy consumption attributable to NILT

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

NIL Technology ApS
Nymøllevej 85
2800 Kongens Lyngby
Denmark
www.nilt.com
VAT: DK 29310203

Labor conditions

Anyone who works directly or indirectly for NILT is entitled to his or her basic human rights. NILT's suppliers should be committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct worker, and any other type of worker.

Freely chosen employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign immigrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker, by the relevant service provider or employer.

Child labor

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all applicable local laws and regulations, is supported. Special consideration must be taken to ensure that work done by workers under the age of 18 respects

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

their ability and does not pose any risk to their health or safety, this includes night shifts and overtime.

Wages and working hours

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

Workers should be granted stipulated annual leave; sick leave and maternity/paternity leave without any form of repercussions.

Humane treatment, non-discrimination and non-harassment

Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers, and appropriate grievance mechanisms must be available. Suppliers should be committed to a workplace free of harassment and unlawful discrimination, and shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

Freedom of association

In conformance with local law, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

NIL Technology ApS
Nymøllevej 85
2800 Kongens Lyngby
Denmark
www.nilt.com
VAT: DK 29310203

Health and safety

At NILT we believe that a safe and healthy work environment for all workers ensures stability and productivity. We expect all our suppliers to work toward implementing the international occupational health and safety management standard OHSAS 18000 or a similar framework for their health and safety work.

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

Occupational safety

Potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified, assessed and mitigated. This includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women and 'nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

Industrial hygiene

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards were identified,

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

NIL Technology ApS
Nymøllevej 85
2800 Kongens Lyngby
Denmark
www.nilt.com
VAT: DK 29310203

suppliers shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

Physically demanding work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

Machine safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers

First aid

First aid equipment must be available in a building, and at least one person in each department should be trained in basic first aid. It is recommended that a doctor or nurse is available on short notice in the event of an accident on the premises. The employer should cover the costs (not covered by social security) of medical care for injuries incurred on their premises.

Sanitation, food and housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the supplier, or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heating and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

NIL Technology ApS
Nymøllevej 85
2800 Kongens Lyngby
Denmark
www.nilt.com
VAT: DK 29310203

Regulatory and Technology Compliance

Product Safety and Quality

We are committed to developing and manufacturing products and technologies ethically and lawfully. Therefore, NILT wants to collaborate with suppliers who demonstrate an equally strong focus on regulatory and compliance requirements, safety and quality throughout their own operations and those of their suppliers.

Suppliers are expected to:

- Deliver products, services and technologies that are always compliant with applicable regulatory and safety standards and requirements as well as NILT's agreed to specifications,
- Systematically, consistently and globally implement:
    - robust mechanisms and adequate resources, including legal changes monitoring
    - quality standards, protocols and controls,
    - regularly train their personnel accordingly,
- Promptly and timely alert NILT of any actual or potential risks resulting from the above that may impact the Suppliers performance and/or any of their products, services and technologies whether delivered or to be delivered to NILT.

Permits

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

Pollution prevention

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means.

Hazardous substances and waste

Chemicals, waste, and other materials posing a hazard to humans, or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

or reuse, and disposal. Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

Water management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

Carbon emissions and climate strategy

NILT is committed to reducing its footprint in line with the scientific consensus on the urgency of addressing climate change. Given that most of our emissions take place in our supply chain, we encourage our suppliers to set equally ambitious carbon reduction targets (Greenhouse Gass Protocol), have transition plans in place to achieve these targets and make carbon emissions data available to NILT proactively through public disclosures and upon request, covering both corporate level emissions and product/component-level emissions attributable to NILT through life-cycle assessments (LCAs).

Material use and circularity

Suppliers are to adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

NILT is committed to supporting a shift to a circular economy through sustainable product development and management, by optimizing for sustainability in materials, repairability,

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

durability, packaging, reuse and recycling, manufacturing, and distribution. Where relevant, suppliers are expected to support this transition.

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

NIL Technology ApS
Nymøllevej 85
2800 Kongens Lyngby
Denmark
www.nilt.com
VAT: DK 29310203

Responsible Mineral Sourcing

In line with current global standards, NILT promotes responsible sourcing of minerals throughout its supply chain.

Conflict minerals are certain types of raw materials (such as tin, tungsten, tantalum, and gold) that come from specific regions where human rights violations and violent conflicts are occurring.

NILT expects its Suppliers to commit to the responsible sourcing of all minerals and materials.

NILT does not want to use conflict minerals from conflict-affected or high-risk areas.

Import and Export Control

NILT is committed to complying with the laws and regulations that govern the import, export and reexport of products, parts, components, technologies, technical data, services, etc.

Import and Export Controls exist to protect national security interests, enforce international laws, defend human rights, maintain peace and security, prevent armed conflicts, and create consequences for bad behavior. Any violation of these laws may have serious consequences for our operations, including business disruption and the loss of export privileges.

Therefore, NILT needs to understand which product, component or technology provided by a Supplier is subject to restrictions and may have an impact on its own ability to import, export or reexport products or technologies.

NILT requires its suppliers to:

- Comply with the import and export control regulations,
- Provide explicit, truthful, and accurate information about the origin of, export classification, and export restrictions related to products/materials, services, software, etc.,
- Obtain export control licenses when required,
- Notify NILT of any change as soon as applicable or any relevant information that may impact or disrupt NILT's activities.

Economic Sanctions

NILT is committed to strictly comply with economic sanctions laws, regulations and programs and strives to do business with Suppliers who are equally both committed and organized to respect applicable economic sanctions.

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

Economic sanctions, including but not limited to embargoes, trade, and financial restrictions, are imposed by governments or by other organizations (i.e., the United Nations, the European Union, the United States) and restrict and even prohibit companies from conducting business with certain countries, individuals, or entities.

Therefore, to avoid the risk of sanction violations, the Suppliers must, as a minimum:

- make sure that no order accepted from or placed with NILT is in breach of any applicable economic sanction's regulations be it related to individuals, entities, end-users, locations, products or technologies,
- conduct appropriate due diligence and screening on their own stakeholders (including their customers, banks, logistics companies, suppliers, etc.),
- not cause NILT, directly or indirectly, to violate any applicable sanction programs,
- notify NILT without undue delay of any suspected activities that may disrupt or impact NILT's operations

Data Protection Regulations

Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and workers. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Business Ethics

In NILT we do business in an ethical way. Our goal is to demonstrate the highest level of ethics and integrity in our business dealings. We expect from our suppliers that the highest standards of integrity are to be upheld in all business interactions.

Fair Competition and Antitrust

Competition should be based on the merits of supplier's products, technologies and support or quality. In order to ensure fair competition, illegal actions intended to unfairly disadvantage consumers, drive competitors out of business, or force customers or suppliers to accept unfair conditions, should by no means be tolerated.

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

We require our suppliers to prohibit and actively prevent anti-competitive practices, whether they relate to inappropriate exchange of information or illegal arrangements with competitors, abuse of dominant position, or any inappropriate behavior that may impact competition.

Suppliers must never collude with competitors to form cartels, engage in price-fixing, market allocation, and bid rigging, or to exchange sensitive business data with their competitors in attempt to restrict competition.

Bribery and anti-corruption

Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

Combating Money Laundering and Criminal Activities

We expect our suppliers to prevent and avoid any activities that might directly or indirectly contribute to the funding of armed groups.

In addition, the practice of money laundering is illegal and often associated with criminal and terrorist activities.

Suppliers should only exchange goods and services for acceptable and lawful forms of payment and closely monitor payments, invoices, and other transactions to better prevent laundering and criminal activities.

Avoiding Conflicts of Interest

Business decisions or transactions involving NILT should never be influenced by personal or family interests nor benefit personally to the decision maker, and therefore should be free from any conflict of interest.

For instance, investing, directly or indirectly, in a Supplier working with NILT, a supplier's parent company or its subsidiaries is not permitted. Similarly, borrowing money or obtaining any personal advantage from a supplier is also prohibited.

As a result,

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

Suppliers should never accept nor encourage a NILT employee to enter a transaction or a relationship that could result in a breach of the above rules,

In case of any doubt as to an actual or potential conflict of interest with NILT or any of its employees, Supplier should promptly discuss it with its NILT contact or report it via the Whistleblower system.

Protecting Assets, Confidential Information and Data

NILT takes the confidentiality and protection of its assets (in particular intellectual property, trade secrets, know-how, patents and trademarks, non-public commercial and strategic information), as well as the protection of business data, very seriously. This includes data entrusted to NILT by its stakeholders.

NILT strives to work with Suppliers who adhere to and are committed to complying with intellectual property laws and non-personal Data Protection laws, especially when acting as data processor for NILT.

As a consequence:

Suppliers should not use NILT's physical and intellectual property, confidential information, data, patented technology, documentation, or other materials without written permission or outside the scope of work performed for NILT.

Suppliers are not permitted to write or speak about or on behalf of, NILT, NILT projects, or NILT customers in any public manner, whether in traditional media, social media, or any other public forum. No public statement or communication may be made that would lead to the disclosure of NILT's or NILT customers' or other stakeholders' confidential information. Any request or invitation for an interview relating to NILT must be directed to NILT personnel.

Suppliers, in order to avoid risk of inappropriate disclosure of restricted or controlled information and personal data to unauthorized persons, or to avoid misuse of assets, should take preventive and mitigating actions such as training, physical, electronic, digital and cybersecurity protection measures, IT charters and audits and controls.

Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

NIL Technology ApS
Nymøllevej 85
2800 Kongens Lyngby
Denmark
www.nilt.com
VAT: DK 29310203

Compliance Effectiveness and Continuous Improvement

Suppliers are responsible for:

- Ensuring a similar Code of Conduct is passed on appropriately, known, understood and respected throughout their operations and supply chain (especially those of their employees, contractors…, assigned to a NILT-related activity, contract, or mission),
- Creating and maintaining the culture of integrity and compliance in their organizations,
- Implementing the programs and measures necessary to comply with this Code of Conduct such as
    - periodic training,
    - periodic proactive risk assessments and compliance monitoring,
    - adequate level of internal controls and management systems,
    - due diligence and subcontractors' selection processes,
    - Prompt mitigation and remediation of compliance risks or failures.
- Consulting their NILT contact in case of any doubt as to the interpretation of this Code of Conduct
- Reaching out immediately to them in case of non-compliance or issues that may have an impact on NILT, cooperating with NILT on identifying, qualifying, mitigating and resolving issues arising from their direct or indirect activities for NILT.

NILT reserves the right to conduct ad hoc or regular due diligence, compliance audits of our suppliers' practices and to share improvement plans as needed.

Reporting Issues

We are all personally responsible for doing our part to uphold integrity. If supplier think something is not right, they should not remain silent, they have a voice.

Indeed, NILT encourages suppliers to speak up and ask for help in case of any doubt about a possible compliance matter concerning NILT, especially if they witness any suspicious behavior or suspect that an activity may be in violation of this Code or other applicable regulations.

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.

NIL Technology ApS
Nymøllevej 85
2800 Kongens Lyngby
Denmark
www.nilt.com
VAT: DK 29310203

Equally important, they should contact their NILT representative or NILT (quality@nilt.com) immediately. They may also report concerns via NILT's confidential reporting hotline at wb - Front page

Suppliers can trust that any concerns they raise will be considered, promptly reviewed, and investigated.

Retaliation against anyone for reporting an issue in good faith is a violation of our Code of Conduct. NILT takes this very seriously. If a Supplier believes that retaliation has happened, they should report the matter right away to NILT.

As always, we welcome feedback. You are welcome to contact NILT on quality@nilt.com.

References

The Ten Principles | UN Global Compact

Take Action for the Sustainable Development Goals - United Nations Sustainable Development

REACH Legislation - ECHA (europa.eu)

Homepage | GHG Protocol

ILO Declaration on Fundamental Principles and Rights at Work | International Labour Organization

Revision and Approval

Rev.	Date	Nature of Changes	Who	Reviewed by	Approved By
0	29-10-2024	First release	Henrik N.	Theodor N, Pamela R.	Theodor N.
01	13-11-2026	ECN000115 – Registered in Teamcenter as DOC000013 (former IMS document GL-MA-P-0320); footer updated with the document number and the confidentiality statement	Yap C.H.	Xu Y.	Sami M.

NILT Proprietary and Confidential
This document is controlled in the NILT PLM database. Verify correct version before use.