

# Supplier Code of Conduct – Newsec

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**Supplier Code of Conduct**

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# Supplier Code of Conduct

## 1. Purpose of The Supplier Code of Conduct

Newsec is committed to a long-term positive impact on the society, the environment, and the economy. The sustainable development and management of our clients' properties have the greatest impact on Newsec's sustainability performance. Our Supplier activities contribute largely to this impact and therefore we have set high requirements on our Suppliers as well. As a Supplier to Newsec you are an important partner to reach our and our clients' sustainability goals.

This Supplier Code of Conduct highlights our commitment regard human rights, sustainability, and ethics. We only work with Suppliers that meet or have agreed to meet the requirements set out in this Supplier Code of Conduct. Newsec also expects suppliers to avoid violations, reduce risks and negative impacts within their own supply chain.

This Supplier Code of Conduct is based on internationally recognized conventions regarding human rights, labor law, environment, and anti-corruption regulations.

## 2. Who does the Code concern?

All Newsec contracted Suppliers, direct and indirect, and Suppliers Newsec acquires on behalf of clients are required to comply with The Supplier Code of Conduct. Excluded are Suppliers of single transaction such as a travel ticket, restaurant, or similar. Suppliers are defined as business partners, suppliers, service providers, consultants, agents, subcontractors.

## 3. How is compliance reviewed and ensured?

We expect our Suppliers to have a policy on corporate sustainability in place covering social, environmental sustainability as well as business ethics issues topics. The policy should highlight how the impact is monitored and measured. This Supplier Code of Conduct highlights our minimum expectations on topics covered by the Supplier's policy.

Newsec has the right to inspect and audit Supplier to the extent necessary to ensure that the Supplier complies to the requirements. The Supplier must ensure that The Supplier Code of Conduct is implemented through its entire supply chain. Due to increase in reporting requirements from the European union (e.g. CSRD, CSDDD), suppliers are required to provide necessary operational and sustainability data, when requested.

The Supplier must comply with legislation and The Supplier Code of Conduct even in the case that the latter sets a higher standard than legal requirements. If The Supplier Code of Conduct conflicts with legal requirements Newsec must be informed. Newsec expects quick communication at cases of non-compliance with the requirements in the Supplier Code. You can report any case of non-compliance Newsec directly to one of Newsec's national purchasing department or via our website Whistleblowing ([newsec.com](https://www.newsec.com)).

If the Supplier fails to comply with the conditions of The Supplier Code of Conduct and improvements are not made within the agreed period, the business collaboration may be terminated.

## **4. Area of impact and importance**

Newsec's three areas of impact and importance, under which Suppliers are expected to comply, are: Social sustainability, Environmental sustainability, and Business ethics. This Supplier Code of Conduct has been structured and requirements described according to these areas.

### **4.1 Social responsibility**

Throughout Newsec's business activities, we take into consideration the impact on people's health and well-being, human rights, workplace environment, local community, and society at large. This principle extends to our Supplier activities, and we have set the below minimum expectations on our Suppliers that include the goal of "zero accidents at work".

#### **4.1.1. Workforce**

The Supplier ensures that no child or slave labour is used at any point.

#### **4.1.2. Pay and working conditions**

The Supplier must comply with local legislation and collective agreements related to minimum wage, working hours and overtime pay. If there is no such local legislation, the latest relevant international frameworks, standards, and legislation are followed. Wages must always be paid directly to the employee at the agreed time.

#### **4.1.3. Health and safety**

The Supplier must comply with all applicable international and national laws and directives related to occupational health and safety. All employees must be informed of any potential safety or health risks involved in their work. Employees must be provided with health care services and must be covered by employee insurances relevant for the activities performed. Appropriate work and protective equipment must be provided for the employees. Written safety instructions must be made available to all employees. Suppliers must record all accidents, incidents and hazards and take measures to proactively minimize any risks. All deliveries and activities must be carried out in a safe manner and in compliance with local legislation.

The health and safety of our tenant and users in clients' properties are key priorities. We expect our Suppliers to strive to continually improve their operations and ensure user satisfaction. Suppliers must comply with safety and security policies and instructions. Any identified risks and issues are reported immediately.

#### **4.1.4. Equality and diversity**

The Supplier must promote gender equality and diversity in their own organization, boards, and client relationships. The Supplier must ensure that there is no discrimination, harassment, violence, or threat of these on the grounds of ethnic origin, gender, religion, social background, disability, political views or sexual orientation.

#### **4.1.5. Freedom of association**

The Supplier must respect their employees' right to join a trade union and negotiate their terms of employment collectively. The service provider must actively promote their employees' right to use the help of trade union representatives (e.g. shop steward) with matters related to their employment contracts.

## **4.2 Environmental sustainability**

Newsec expects its Suppliers to manage their operations responsibly in relation to the environment. The Supplier acts in accordance with the relevant environmental laws and reduce environmental risks and impacts relating to among others climate change and biodiversity.

The Suppliers should have a structured environmental management system in place for improving environmental performance, setting targets, and performing follow-ups.

### **4.2.1. Biodiversity and ecosystems**

The Supplier should understand their impact on environment and ecosystems and strive to avoid and minimize negative impacts.

### **4.2.2. Climate change and greenhouse gases**

The Supplier actively works to reduce climate emissions in their operations by e.g. reducing energy consumption and emissions from transports and fuels as well as choosing low carbon products and solutions.

### **4.2.3. Pollution and toxic materials**

The Supplier should minimize emissions and pollution created directly or indirectly as a result of their business activities. Use of heavy metals and hazardous chemicals in consumer goods, production and final products must be restricted and they should be substituted with less hazardous materials whenever possible.

### **4.2.4. Resource efficiency**

The Supplier should use resources such as energy, water, land and raw materials in an efficient and sustainable manner. The Supplier should consider reused products and materials when possible and/or materials with recycled content. Resource efficient and/or recyclable packaging materials should be considered when possible.

### **4.3 Business ethics**

Everyone within Newsec and all Suppliers have the possibility to bring up grievances and suspected misconduct, regardless of their title or position. Newsec will investigate reports and taking appropriate action based on our findings. Newsec and Suppliers do not retaliate against anyone submitting a report in good faith regarding grievance or suspected misconduct.

#### **4.3.1. Ethical and value-based business**

Newsec and Suppliers comply with the laws and regulations in our activities. Together we fight against corruption, bribery, and the black economy. We encourage activities that are conversational, transparent, and responsible.

Newsec has a zero-tolerance policy on all forms of bribery and illicit means of influence. Newsec expect that Suppliers have the same policy and enforce it throughout their supply chain. Giving or accepting gifts in relation to business agreements is explicitly forbidden. Any conduct or actions that may create a sense of obligation or gratitude must be avoided.

Suppliers developing or using artificial intelligence such as machine learning, intelligent systems or similar are expected to secure that it is in line with ethical standards and complies with legislations regarding (not limited to) human rights and confidentiality.

#### **4.3.2. Sanctions**

Sanctions are used to prohibit business with certain countries, individuals, and sectors. Suppliers must be transparent about real beneficial owners. It is of great importance that the Supplier is not before nor during the business relationship gets sanctions against them.

#### **4.3.3. Money Laundry**

The Supplier shall make certain that they comply with all applicable law regarding money laundry.

#### **4.3.4. Protection of assets and data**

Protection of assets and confidentiality are extremely important to Newsec. The Supplier shall protect Newsec's tangible and intangible (immaterial rights) assets. Only assets needed for the completion of the assignment shall be used.

Inside information is strictly confidential and all unauthorized disclosure of such information is prohibited. It is also prohibited, and unlawful, to use the knowledge of inside information.

The Supplier will not use the Newsec brand without written consent from Newsec.

The Supplier must ensure that they process all personal information data according to the current data protection legislation, with good processing practice and with high due diligence. The service provider must ensure that they have and will fulfill without limitation all necessary requirements in their activities regarding processing personal information, such as documentation of the process and proper technical and organizational measures taken to protect personal information.

#### **4.3.5. Fair competition**

The Supplier shall promote fair competition and will not start unlawful discussions or participate in agreements with competitors regarding pris, market share or other activities not allowed by legislation.

# Questions

If there are questions about the Supplier Code of Conduct you can contact the national purchasing department.