

# RESPONSIBLE SOURCING STANDARDS

**PROCUREMENT** 

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### NNIT RESPONSIBLE SOURCING STANDARDS

The Purpose of NNIT's Responsible Sourcing Standards is to outline the collaborative approach in NNIT's relations to suppliers and to ensure responsible and sustainable business conduct.

NNIT's <u>Corporate Responsibility Policy</u> outlines NNIT's general approach to working with responsibility and sustainability, and this is also imbedded in the way NNIT works with its suppliers.

To NNIT, putting good IT into practice for customers also means making a more positive mark on society. NNIT believes that digital transformation plays a crucial role in the green transition of the global society.

However, at the same time, the IT industry is a large contributor when it comes to CO<sub>2</sub> emissions. As a conscience-driven player in the IT industry, NNIT wishes to show how IT and digitization can lead to a more sustainable future. And NNIT wishes to enable a dialogue – leading to action – with its stakeholders about the sustainable digital transformation. NNIT's suppliers constitute important stakeholders in this endeavor.

NNIT relies on the conceptualizations of responsibility and sustainability provided by the United Nations (UN) Global Compact, the Sustainable Development Goals, the EU Taxonomy and the ESG principles. In line with NNIT's values of being open and honest, conscience driven and value adding, NNIT believes in the need for an honest, collaborative, and explorative dialogue with suppliers to facilitate real change. NNIT does not claim to hold all the answers to transforming its value chain. Instead, NNIT will find these solutions together with its suppliers to better ensure the realizability and mutual engagement in transforming their businesses together.

NNIT views the standards expressed herein as an integral part of NNIT's business relationship with its suppliers and NNIT expects its suppliers to share its fundamental principles and obligations to ensure responsible and sustainable conduct.

NNIT's Responsible Sourcing Standards is not a standalone document, but is imbedded in NNIT's procurement processes and procedures, and responsibility and sustainability are incorporated into the qualification- and approval processes of NNIT's suppliers.

NNIT requires its suppliers to, as minimum, comply with the requirements of UN Global Compact and be actively engaged in improving their sustainability performances together with NNIT.

## GENERAL COMPLIANCE WITH LAWS AND REGULATIONS

NNIT's suppliers must comply with all applicable laws and regulations in all countries where they conduct business as well as to the standards specified in this document.

This also includes the following laws and regulations

#### **Competition Law**

NNIT's suppliers must comply with and adhere to international and local competition law and regulation. NNIT does not accept to neither directly or indirectly support violation or circumvention of competition law and requires that NNIT's supplier's does not accept it either.

#### **Export Control**

NNIT's suppliers must adhere to and comply with any export control restrictions and regulations.

#### **Privacy**

NNIT requires its suppliers to comply with international and local law regarding the processing and handling of personal data that pertains to NNIT or NNIT's deliveries and/or services.

#### Sustainability and transparency

NNIT requires its suppliers to comply with the EU Taxonomy Regulation, its affiliated Delegated Acts, and the Corporate Responsibility Disclosure Regulation (CSRD) regarding disclosure of non-financial information.

### **ENVIRONMENT**

NNIT's suppliers must engage in and together with NNIT ensure that their operations minimize adverse impact on the environment.

NNIT requires its suppliers to as minimum comply with all applicable environmental laws and regulations in the country of operation, and in so doing obtain and maintain the necessary registrations, permits and licenses.

Furthermore, NNIT's suppliers are required to invest or actively engage, as applicable, in activities with the purpose of

- a. identifying, measuring and/or reporting on greenhouse gas emissions in line with the GHG Protocol.
- b. setting or commit to setting targets for reducing GHG emissions, preferably with the Science Based Targets initiative (SBTi) where appropriate,
- c. converting energy use to renewable energy to the extent possible within the local context,
- d. minimizing energy use, and
- e. transforming operations and activities to the extent possible to comply with criteria laid out in the EU Taxonomy.

NNIT expects its suppliers to proactively develop, plan and supply its deliveries to NNIT whilst minimizing adverse impact on the environment, which NNIT defines in line with the EU Taxonomy as impact on the climate, biodiversity and eco-systems, water- and marine resources, circular resource use, and pollution.

NNIT's suppliers will find their impact on the environment applicable to their services to different degrees.

Therefore, NNIT will assess its suppliers' sustainability and responsibility performance based on below parameters from a life cycle perspective and a qualitative assessment of relevance for the specific supplier:

	Material environmental topics	Parameters
Emissions	Energy and GHG emissions: Total use, Renewable energy use, and GHG emissions	<ul> <li>Monitored use</li> <li>Energy efficiency initiatives</li> <li>Energy mix</li> <li>Renewable power certificates</li> <li>Report on GHG emissions</li> </ul>
Water	Water: Use, discharge, scarcity, risks, and stress levels	<ul><li>Monitored use</li><li>Water efficiency initiatives</li></ul>
Waste	Waste: Addressing waste from operations	<ul><li>Monitored use</li><li>Waste reduction initiatives</li></ul>
Pollution	Pollution: Addressing pollution from operations	<ul><li>Monitored use</li><li>Pollution minimizing initiatives</li></ul>
v	Chemicals: Use, use of less toxic substances, and select circular chemicals	<ul> <li>Monitored use</li> <li>Compliance report on applicable regulations (e.g., REACH, SVHC, and RoHS)</li> </ul>
Materials	Packaging circularity: Addressing packaging sources and end of life waste streams	<ul> <li>Monitored use</li> <li>Re- or upcycling initiatives (programs and processes)</li> </ul>
	Product circularity: Addressing product sources and end of life waste streams	<ul> <li>Re- or upcycling initiatives (programs and processes)</li> </ul>
Support Environmental Management	Governance, continuous improvements, and certifications	<ul> <li>Environmental         management system</li> <li>Environmental         corporate score (e.g.,         Sustainalytics)</li> <li>Certified system (e.g.,         ISO)</li> </ul>

## **SOCIAL PRACTICES**

NNIT's suppliers must support and respect the protection of internationally proclaimed human rights and

make sure that they are not complicit in human rights abuses.

#### **Dignity and rights**

NNIT's suppliers must provide their employees with equal dignity, freedom, and rights in accordance with the UN Declaration of Human Rights.

#### **Equality and non-discrimination**

NNIT's suppliers must provide its employees with equal dignity, freedom and rights and shall not discriminate in their hiring or employment practices on grounds of race, skin color, gender, sex, sexual orientation, language, religion, disability, political or other opinion, marital status, pregnancy, national or social origin, property, or birth or other status.

Workers must not be subjected to medical tests that can be used in a discriminatory way.

#### **Health and safety**

NNIT's suppliers must provide their employees with a safe, healthy, and hygienic workplace and accommodation, where this is provided by the company.

NNIT requires its suppliers to implement effective programs and to take appropriate precautionary measures for ensuring the safety of workers by minimizing work-related accidents and illnesses.

NNIT's suppliers must identify and assess emergency situations, implement emergency plans and response procedures in the workplace and in any accommodation provided by the company, and provide sufficient fire exits, escape routes and firefighting equipment.

#### Wages and benefits

Suppliers shall pay employees at least the minimum wage required by law or the prevailing industry standard in the country, and shall provide all legally mandated benefits, including medical insurance, social insurance and pensions, in full and on time.

#### **Working hours and holiday**

Suppliers shall not breach local regulations on working hours and shall remunerate overtime in accordance with local laws and regulations as a minimum. Employees, including those on temporary contracts, shall not be required to work more than 60 hours a week, including overtime, on a regular basis (or the maximum legal working hours if this is less than 60). Employees shall be entitled to at least one day off in every seven-day period and shall receive paid annual leave and holidays in accordance with local laws.

Wage deductions as a disciplinary measure shall not be permitted, nor shall any wage deductions not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures shall be recorded.

#### **Child labor**

Suppliers shall not recruit or employ child labor. The minimum age of workers shall be 15 years, or the minimum age set by the national laws in the country of manufacturing, whichever is higher. Young workers, i.e., those above the minimum age and below the age of 18, may only be employed for non-hazardous work.

#### Freely chosen employment

Suppliers shall not use forced or involuntary labor (e.g., forced, bonded, indentured, or involuntary prison labor). Employers shall not retain workers' identity papers or hold deposits from workers. Workers shall have a copy of the written employment contract setting out the terms and conditions of their employment.

#### Freedom of association and collective bargaining

Suppliers shall respect the rights of employees established in local law to join or not join labor unions, seek representation, and join worker organizations.

Workers shall be able to bargain collectively, and worker representatives shall not be discriminated against.

#### **Treatment of employees**

Suppliers shall treat their employees with respect and dignity and shall not subject them to any kind of cruel, inhuman, or degrading punishment, physical, verbal, or sexual abuse, or threat of abuse or harassment.

#### **Treatment of indigenous peoples**

Suppliers shall conduct their operations with respect for indigenous peoples and shall ensure due diligence when operating in areas where projects may affect indigenous peoples.

Suppliers shall not in any way expose indigenous peoples to exploitation or expropriation of their labor nor appropriation or their social, cultural, geographical, or economic valuables.

### **GOVERNANCE**

NNIT's suppliers shall act with integrity while conducting business and inform NNIT of any significant impact in the supply chain and report any non-compliances to the NNIT Responsible Sourcing Standards to NNIT.

#### **Business integrity**

Suppliers shall comply with all laws and regulations on bribery, fraud, corruption, and prohibited business practices applicable in the specific country. Suppliers shall not engage in any form of bribery, facilitation payments, corruption, extortion, or embezzlement. Suppliers shall not give or receive bribes – including indirect bribes made through intermediaries and third parties – to obtain undue or improper advantage.

Suppliers shall also refrain from offering donations, grants, expensive gifts, and extravagant entertainment to NNIT's employees or other counterparts in NNIT to influence business decisions.

#### Minerals from conflict-affected and high-risk areas

NNIT is committed to eliminating conflict minerals within is supply chain. Suppliers that supply products or parts hereof that contain metals or minerals (Minerals) must comply with OECD's "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas".

NNIT requires its suppliers to exclusively source minerals from certifiable conflict free areas if sourcing from the Democratic Republic of Congo.

#### Whistleblower program

Subject to Danish act no. 1436 of June 24, 2021, on Whistleblowing, suppliers must establish anonymized and secure whistleblower programs to ensure safe and reliable systems and ensure the protection of whistleblowers

#### **Environmental and Social management systems**

Suppliers are expected to implement environmental and social sustainability governance structures appropriate to their business in terms of company size and environmental and social impact, incl. processes for

- a. how to prevent and control identified potential adverse sustainability impact, and
- b. how to treat, remediate or control identified and actual adverse sustainability impact.

The Security StC is chaired by a representative from NNITMAN and includes the Chief Information Security Officer (CISO), the Data Protection Officer (DPO), and management representatives from NNIT line of business as well as from relevant staff functions.

## **SUB-SUPPLIERS**

NNIT requires its suppliers to inform their own suppliers of products and services to NNIT of the abovementioned standards and to ensure that the sub-suppliers comply with these standards.

Suppliers are required to report any potential or actual risks of non-compliant practices on the part of sub-suppliers to NNIT.

On request, suppliers shall inform NNIT of all sub-suppliers that are used in deliveries of products and services to NNIT.

## **DOCUMENTATION**

NNIT's suppliers must, upon request, provide NNIT with information and documentation regarding their compliance with NNIT's Responsible Sourcing Standards.



#### **About NNIT**

NNIT is a leading provider of IT solutions to life sciences internationally, and to the public and enterprise sectors in Denmark. We focus on high complexity industries and thrive in environments where regulatory demands and complexity are high.

NNIT consists of group company NNIT A/S and subsidiaries SCALES, Excellis Health Solutions and SL Controls. Together, these companies employ more than 1,700 people in Europe, Asia and USA.