

NORATEL GROUP CORPORATE SOCIAL RESPONSIBILITY POLICY

Date: 2023-05-25

Doc nr: NG089 rev 6

All companies and employees in the Noratel Group are committed to uncompromising integrity and a high standard of business in everything we do. The Noratel reputation is an asset we have created during many years of high business conduct. We shall continue to cherish and develop this reputation by following our code of conduct. We are working against and following the 10 principals according to the UN Global Compact and following the requirements in UK Legislation - Modern Slavery Act.

To be able to maintain a high business of conduct it is crucial our suppliers contribute by following local laws and regulations. Our relationship with suppliers shall be based on their collaboration to help our companies and employees to maintain a high business conduct.

The Noratel Group Corporate Social Responsibility Policy is aligned with business ethics of discoverIE covering Modern Slavery, Whistleblowing Policy, Anti-bribery and Corruption Programme, and Group Tax Strategy.

Noratel Group Code of Conduct and Responsibilities

Noratel Group employees are expected and committed to follow the requirements in this document.

Ethical Business behaviour

- Noratel will conduct its business in an open, transparent, and ethical manner.
- Noratel will not practice or tolerate any form of corruption, extortion, embezzlement, or money laundering. Noratel will not offer or accept bribes or other unlawful incentives (e.g., facilitation payments) to or from their business partners or government officials.
- Noratel Employees are committed to the highest standards of integrity and corporate governance in all contacts on behalf of the company. Never offer any bribes, kickbacks, illegal contributions, or other improper payments to business partners. Never involve yourself in taking bribes, kickbacks, illegal contributions, or other improper payments.
- Noratel will not receive or provide any kind of gifts or personal benefit which could be perceived as a bribe. In all cases, gifts or entertainment shall not be offered to improperly influence a business relationship and must not violate applicable laws or ethical standards.
- Noratel will disclose to the business any situation that could constitute a conflict of interest, such as Noratel employees having professional, private and/or significant financial advantages or interests in any of our businesses.
- Noratel will conduct our business in line with fair competition and in accordance with all applicable anti-trust laws.

Governance (International and local laws)

- Implement an effective management system and a governance structure to facilitate compliance with all applicable laws with respect to the expectations set.
- Follow applicable laws and regulations in the area and countries we operate. Including comply fully with all obligations in relation to all taxes due within the territories in which Noratel operate or make supplies. Noratel do not participate in tax evasion nor facilitate tax evasion by others. Noratel should take appropriate steps to ensure that all who act for or on their behalf also comply with such obligations.
- Understand and follow international trade control and custom laws and regulations.

- Conduct our activities with work health and safety laws and regulations in all countries and areas we operate.
- Follow all environmental regulations including directives concerning our products on the market they are introduced. Products and materials supplied to Noratel do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups and cause or foster human rights abuses.

Human rights

- Noratel support and respect the protection of internally proclaimed human rights and will support the work in the area we operate and within our sphere of influence.
- Noratel will not tolerate human rights abuses and will not engage or be complicit in any activity that enrol or encourages human rights abuse.

Employment practices

- Noratel supports the principles in the International Labour Organization's (ILO's) Declaration and United Nations Global Compact as fundamental principles and rights at work:
 - We uphold the freedom of association and the effective recognition of the right to collective bargaining.
 - We have no forced or compulsory labor.
 - We do not have child labour (under the age of 15).
 - We emphasize having the right work life balance.
- Noratel will provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, physical punishment, or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment.
- Equal opportunity to harassment free work environment without regard to their race, colour, religion, national origin, gender, gender expression, gender identity, genetic information, sexual orientation, family status, age, disability, political affiliation, pregnancy, social origin, union membership or any unlawful criterion under applicable law.
- We are not involved or support any form of human trafficking.

Health and safety

- Noratel is following the guidelines of ISO45001 with objective to have a certified management system by FY25 for all companies.
- Noratel will adequately protect their employees against chemical, biological and physical hazards. Physically demanding tasks and conditions in the workplace, as well as risks associated with infrastructures used, are adequately managed to protect their employees.
- Noratel will provide appropriate safe work procedures, technical protective measures and adequate maintenance to mitigate health and safety risks in the workplace and to prevent accidents and occupational illnesses. In addition, Noratel will provide employees with appropriate personal protective equipment.
- Safety information relating to any identified workplace risk or hazardous materials – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards. A safe and healthy working environment shall include as a minimum the provision of potable drinking water, adequate lighting, temperature, ventilation, sanitation and, if applicable, safe and healthy company living quarters.
- Noratel comply with product safety regulations, label products properly and communicate product-handling requirements. Noratel provide to relevant parties the applicable documentation containing all necessary safety-relevant information for all hazardous substances in case of a legitimate need.
- All companies are using and providing the visitor information to all customers, suppliers, and other visitors to prevent any accidents from happening.

Environment

- Noratel has implemented a certified management system following the principles in ISO 14001.
- Noratel has identified its activities contributing to the environmental impact. It is our responsibility to work to minimize the impact from these activities to contribute to pollution prevention, biodiversity, and resource conservation.
- Noratel take the initiative to promote our employees' awareness of our environmental responsibility.
- Noratel has implemented a target to reduce carbon emissions to net zero (Scope 1 & 2) by 2030. Along with the focus on selling into markets that are aligned with a sustainable future, this target reflects Noratel's commitment to reduce the impact of its operations on the environment.
- Noratel encourages the use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout the supply chain.
- Noratel will ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activity that has the potential to adversely impact human or environmental health shall be appropriately managed, measured and controlled. The release of hazardous substances shall be minimized.
- Noratel prevent or mitigate accidental spills and fugitive emissions of hazardous materials.
- Use natural resources (e.g. water, sources of energy, raw materials) in an economical way and preserve them. Negative impacts on the environment and climate caused by Noratel or in their supply chain shall be minimised or eliminated at their source.

Sustainable development

- Noratel has implemented a certified management system in all companies following the principles in ISO 9001.
- Noratel can meet generally recognized quality standards or contractually agreed quality guidelines and standards (ex: APQP4wind).
- Noratel strive to achieve a sustainable product development, under the production phase but also for the entire lifecycle of the product. If we can make a choice, we will always use the material with the lowest total environmental impact. We shall not use materials that consist of any chemicals listed for substitution on international registers like the European Echa.

Crisis management

- Implement plans to address security of employees, facilities, its assets, and business continuity.
- Identify and protect Noratel intellectual property in accordance with the law.
- Respect valid patents, trademarks etc. of others.

Supplier Relationship

- Noratel only do business with suppliers who comply with local and other applicable laws and regulations.
- This Code of Conduct applies to all suppliers currently supplying goods and services to any Noratel business. Noratel will only do business with suppliers who can support and implement the 10 principles of the UN Global compact, including Human Rights, Labour standards, Environment, anti-corruption, transparency, Modern Slavery, Whistleblowing, Anti-bribery and Corruption Programmer.
- Noratel will only do business with suppliers who implement the guidelines in the international management standards ISO 9001, ISO14001 and ISO45001.

Gregory MALHERBE - CEO

