



# CODE OF CONDUCT FOR SUPPLIERS

At the NTG Group

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NTG is dedicated to supporting and respecting all national laws, global human rights, labour rights and business honesty within the transport and logistics sector and to acting ethically anywhere we operate.

This code of conduct for suppliers (the “Code of Conduct”) reflects our commitment in this respect and our dedication to the principles of internationally recognised standards.

Just as we have standards for ethical practice for ourselves, we stress the importance of following the same principles towards all suppliers and business partners in our supply chain and we expect our suppliers to commit to the same principles.

This Code of Conduct sets out the requirements we specify for all our suppliers.

We believe that a focus on values as specified in this Supplier Code of Conduct will strengthen the relationships between NTG and our suppliers and create sustainable business relations. We expect our suppliers to actively ensure that the supplier’s own agents, sub-suppliers and subcontractors also comply with the requirements of this Code of Conduct.

Thank you for being a business partner of NTG.

Best regards,

Mikkel Fruergaard  
CEO, Air & Ocean

Christian D. Jakobsen  
CFO

Jesper E. Petersen  
CEO, Road & Logistics

## Scope and responsibility

The Code of Conduct is applicable to all suppliers and business partners who operate with or on behalf of NTG, including agents, suppliers, sub-suppliers, business partners or distributors. The Code of Conduct is in addition to applicable laws and general principles of law in the jurisdictions where our suppliers operate. We expect all of our suppliers to have in place prudent procedures to ensure compliance with this Supplier Code of Conduct and to make sure that this Supplier Code of Conduct is implemented with its own business partners, in order to ensure compliance throughout NTG's entire supply chain.

## Subsuppliers, subcontractors, agents etc.

This Code of Conduct applies to the full supply chain of NTG, and suppliers are responsible for setting the same or comparable standards for their subcontractors and other business partners who perform services for NTG. It is the responsibility of the supplier to ensure that its subcontractors are informed of the Code of Conduct and uphold the requirements set forth herein.

## Conflicts of interest

Our suppliers' individual interests must never influence their work for NTG if such interests are incompatible with NTG's business interests.

## Human rights

NTG supports and works in compliance with the internationally recognised UN Universal Declaration of Human Rights. Our suppliers are expected to act in compliance with all internationally recognised standards of human rights including the UN Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 ILO Declaration on Fundamental Principles and Rights at Work and all international conventions on child labour.

## No discrimination

NTG applies a complete zero-tolerance policy towards discrimination on the basis of race, colour, religion, gender, age, nationality, sexual orientation, disability, political observation, social background or any status protected by law. All employees shall be protected from all types of harassment in the workplace.

Migrant or foreign workers must be treated with care and respect 'on an equal footing with other employees and provided with working conditions consistent with applicable law and the principles of the UN Global Compact, and the UN Universal Declaration of Human Rights.

## Working environment

We expect our Suppliers to provide safe and healthy working environments for all their employees. This includes an obligation for our suppliers to ensure a reasonable level of accommodation and care for employees working away from home. Suppliers must always ensure that the working environments offered to their employees comply with applicable laws and regulations.

## Working hours and compensation

Our suppliers must comply with all applicable laws and regulations relating to working hours and minimum wages.

## Drugs and alcohol

The work environment of our suppliers must be free from the use and effects of drugs, alcohol and other mood-altering substances.

## Road safety

Our suppliers shall, in cooperation with their subcontractors, conduct road safety initiatives that are continuously evaluated and improved. The initiatives should ensure that our suppliers at all times comply with applicable traffic regulations and reduce unnecessary hazards or risks. Driving must never be carried out under the influence of alcohol, drugs, pharmaceuticals or while fatigued. Mobile phones must be used in hands-free mode only. Compliance is required with the existing regulations regarding driving and rest times for employees who drive heavy vehicles. All suppliers are expected to ensure that they have implemented appropriate measures to comply with the above at all times and proactively implement any changes in their internal policies to meet changes in any local laws and requirements.

## Communication and media contact

No supplier may make statements on behalf of NTG about NTG or our business to the media, investors, financial or industry analysts or in social media or other public fora or contexts. All media inquiries involving NTG must be referred immediately to your local NTG representative who is instructed to refer the matter to the executive management of Nordic Transport Group A/S.

## Confidentiality

NTG strictly prohibits the disclosure of any business-sensitive information about the company or customers that is not in the public domain, such as sharing information about the names of customers externally or distributing any such information through social media or any other external medium.

## Quality standards

We expect our suppliers to ensure that any equipment used when providing services to NTG is of good and sound quality, meets the general and legally required standard of maintenance, and satisfies any safety regulations or measures at all times. We expect our suppliers to comply with any reasonable quality requirements NTG or NTG's customers may have in respect of handling and stowing. However, suppliers are not obliged to comply with specific requests that may be contrary to traffic safety regulations or similar regulations in the jurisdictions in or through which the transport is to take place.

## Fair competition and antitrust

At NTG we want open and fair competition and we do not tolerate violation of competition and antitrust laws and regulations. Competition and antitrust laws promote free enterprise and prohibit behaviour that restricts fair competition. We have internal guidelines ensuring non-tolerance towards any such activities. Likewise, we expect our suppliers to counter any illegal practices.

NTG does not in any way accept any breaches of antitrust laws in any jurisdiction. This includes all kinds of cartels, cooperation on key terms such as rates, fees, charges, share/split of markets, disclosure of information to our competitors or any other arrangement that could eliminate or prevent fair competition. If we detect that any of our suppliers violate antitrust legislation in any jurisdiction, the supplier should expect that action will be taken immediately by NTG regarding the contractual relationship between NTG and the supplier as well as with the public authorities.

## Bribery

NTG is committed to preventing the occurrence of bribery of private, government or public personnel or officials in all activities under our effective control. We expect our suppliers not to offer or accept bribes in any form to any person, whether private or public, direct or indirect, through third parties. NTG will not penalise a supplier for refusing to pay a bribe even if it may result in NTG losing a business opportunity. The prohibition of bribery applies without exception, including in relation to activities where our competitors resort to bribery.

## Environment

Due to our business and size, we acknowledge that we have a responsibility to prevent and minimise our business' negative influence on the environment and the climate. To the extent possible, we support initiatives within our business to develop and apply environmentally friendly solutions and technologies. Our suppliers are expected to comply with all applicable local and international laws and regulations on the protection of the environment and to pursue initiatives to minimise their business' environmental impact.

## Business interruption

Our suppliers shall be prepared for any disruptions of their business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases). This preparedness includes in particular disaster plans to protect both employees as well as the environment as far as possible from the effects of possible disasters arising within the domain of operations.

## Breach of the Code of Conduct for Suppliers

In case of non-compliance with this Code of Conduct, we expect the supplier to take appropriate measures to remedy such breach and to prevent any future reoccurrence. In cases that in the reasonable opinion of NTG are considered to constitute a material breach or repeated breaches, NTG has the right to terminate the business relationship with the supplier with immediate effect and without any compensation to the supplier.

Any behaviour that is or may potentially become an infringement of local law or a breach of this Code of Conduct must be reported to your contact person at NTG, or, if that person is involved or fails to act, to NTG Group Legal at [codeofconduct@ntg.dk](mailto:codeofconduct@ntg.dk). All employees are instructed to treat reported matters seriously and with the appropriate degree of discretion.

## Compliance with the Code of Conduct

Suppliers of NTG will be requested to adhere to this Code of Conduct by physical or electronic signature. The applicable version of the Code of Conduct is available at NTG's home page at any time, and any major updates of the Code of Conduct will be communicated directly to the supplier. NTG may conduct compliance initiatives on a case-by-case basis, such as sending out self-assessment surveys or questionnaires to suppliers to document their compliance with Code of Conduct onsite audits.

### Read and understood

Name	Signature

April 2019, Copenhagen, Denmark