



# SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct is based on the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, and reflects our commitment to responsible business practices, respect for human rights, and supply chain responsibility.

The Supplier Code of Conduct includes provisions on human rights, labor practices, environmental protection, anti-corruption, supply chain responsibility, and grievance mechanisms, which align with the principles and recommendations of these frameworks and standards. By adhering to these requirements, the supplier is committing to responsible business practices and respect for human rights, and is expected to continuously improve its performance in these areas.

The provisions outlined in this Supplier Code of Conduct align with the Minimum Safeguards, which cover social and governance standards, including labor rights, anti-corruption, and respect for human rights.

NREP communicates this Code to current and new suppliers and provides clarification and guidance on the provisions of the Code where required. NREP seeks to achieve application of this Code or alternatively application of a supplier's own code of conduct that meets similar standards as this Code to the extent relevant considering the nature and materiality of the service or product provided.

We expect our suppliers to adhere to and self-monitor compliance with the principles contained in this Code. Compliance will be monitored, for example through self-assessment questionnaires or other forms of compliance.

Employees of NREP or suppliers are encouraged to report non-compliance to their manager/contact at NREP or through NREP's whistle-blower mechanism <https://nrep.whistleblownetwork.net/>

If NREP identifies that a supplier fails to adhere to the principles contained in this Code, NREP will seek to work constructively with such supplier through remedial action wherever possible. If action is not taken within a reasonable period of time, NREP may, to the

## GENERAL REQUIREMENTS

### Compliance with Laws and Regulations

Suppliers must comply with all applicable laws and regulations, including those related to human rights, labor, environmental protection, and anti-corruption.

### Human Rights

Suppliers must respect the human rights of their workers and other individuals affected by their operations, in accordance with the Universal Declaration of Human Rights. This includes freedom of association, the right to collective bargaining, and the prohibition of forced labor, child labor, and discrimination.

### Labor Practices

Suppliers must provide their workers with safe and healthy working conditions, fair wages and benefits, and reasonable working hours. They must also respect the rights of their workers to organize and bargain collectively, and prohibit any form of forced labor, child labor, or discrimination.

### Environmental Protection

Suppliers must comply with all applicable environmental laws and regulations, and strive to minimize the environmental impact of their operations. They must also promote responsible resource use and waste management, and adopt sustainable practices where feasible.

### Anti-Corruption

Suppliers must conduct their business with integrity and transparency, and prohibit any form of bribery, corruption, or other unethical practices.

### Supply Chain Responsibility

Suppliers must ensure that they have control over their supply chain and take steps to identify and address any adverse human rights, labor, environmental, and anti-corruption impacts in their supply chain. This includes promoting transparency and auditing of their supply chain to identify and mitigate any risks and ensuring that their suppliers adhere to this Supplier Code of Conduct.

Suppliers shall conduct risk assessments to identify potential human rights violations, environmental impacts, or instances of corruption in their operations or supply chains. Suppliers should implement measures to prevent and mitigate such risks, and to regularly report on their sustainability performance.

Suppliers must respect the human rights of individuals and communities affected by their supply chain, and take steps to identify and address any adverse human rights impacts.

### Grievance Mechanisms

Suppliers must establish effective and accessible grievance mechanisms for their workers and other individuals affected by their operations, and ensure that grievances are addressed in a timely and fair manner.



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extent possible in compliance with law, suspend supplier's contract until satisfactory progress has been made or may terminate the business relationship.

This Code is in addition to any provisions detailed in individual supplier agreements.

## **BUSINESS PRACTICES**

- Comply with applicable laws, directives, regulations and standards, as well as any collective agreements relevant to its business activities
- Hold all permits, licenses and registrations required for its business activities
- Act in accordance with good business practice and high ethical behavior, including compliance with all anti-corruption, antitrust, fair-competition, anti-bribery and anti-money-laundering laws
- Maintain professional standards throughout all business dealings
- Maintain integrity and confidentiality of data, recordkeeping and intellectual property
- Use information technology or data provided by NREP only to conduct business related to NREP
- Mitigate any insider trading, defined as the purchase or sale of securities while in the possession of material, non-public information.
- Consult with NREP promptly upon identifying actual or potential breaches
- Provide transparency and auditing of supply chain environmental practices

## **ENVIRONMENTAL PRACTICES**

- Comply with the requirements of applicable environmental laws and regulations
- Ensure and maintain knowledge and control over environmental impacts in own supply chain i.e. ensure that efforts are taken to reduce the carbon footprint in the supply chain (interaction with other customers and business partners)
- Promote environmental benefits through actions such as reduced energy and water consumption, efforts to reduce emissions to air, soil and water, implementation of waste minimization and recycling programs, and application of building materials assessments

## **EMPLOYMENT PRACTICES**

- Adhere to employment practices in compliance with all applicable laws and regulations
- Promote a safe and healthy work environment
- Act in respect of internationally declared human rights, treating employees and suppliers in the spirit of equal value of all people
- Prohibit the use of involuntary and child labor
- Seek to provide a work environment free of discrimination, harassment, bullying, intimidation or oppression
- Respect the right of employees to unionise and to engage in collective bargaining
- Comply with minimum wage laws and ensure timely payment of wages directly to employees
- Prohibit inhumane treatment or deductions of wages as a disciplinary measure
- Comply with local labor laws and standards regarding working hours, overtime, public holidays, weekly rest periods and statutory leave including sick leave and parental leave