



Supplier Code of Conduct

General

NN Group is an international financial services company, active in 11 countries, with a strong presence in a number of European countries and Japan. Our business centres around people and trust. Being entrusted with other people's financial matters is a responsibility we take very seriously. At NN, we help people care for what matters most to them. We do so guided by our values **care, clear, commit**.

Sustainable procurement

NN Group operates in an international environment and therefore has a global impact through its services and supply chain. We are committed to the principles of sustainable procurement - as defined by the ISO 20400 norm - and want to partner with our suppliers to further develop their sustainability performance along the supply chain.

The ISO 20400 norm provides guidelines for integrating sustainability into an organisation's procurement processes and defines sustainable procurement as the process of making purchasing decisions that meet an organisation's needs for goods and services in a way that benefits not only the organisation but also society, while minimising its impact on the environment. The [NN Sustainable Procurement Statement](#) sets out our approach to address environmental and social impacts related to our purchasing decisions and our supply chain.

NN Group runs its business in a lawful, ethical, and socially responsible manner. The NN Group Supplier Code of Conduct (SCC) sets forth the conduct NN expects from its suppliers, including subcontractors. Suppliers should fully comply with all applicable national and international laws, regulations, and standards, such as the United Nations Principles, United Nations Human Rights treaties, the core conventions of the International Labour Organisation and the Children's Rights and Business Principles.

We expect you, as our supplier, to support and adhere to the principles outlined in this document.

Environment

At NN, we care about our home planet and recognise that companies have a responsibility to avoid or minimise the negative impacts on the environment, climate, and natural resource. Our approach to managing environmental impacts is outlined in our [Environmental Statement](#).

NN expects our suppliers to:

- Comply with all applicable environmental regulations.
- Promote the environmentally sound use and disposal of resources and products.
- Reduce their own environmental impacts and implement climate change mitigation efforts and circular best-practices throughout their supply chain (e.g. use of renewable energy, efficient business travel, and sustainable production).

- Have in place an environmental policy, statement, or process to mitigate environmental risks.
- Encourage the development of environmentally friendly technologies, practices, and products.

Human rights

At NN, we recognise that companies have a clear responsibility to protect human rights, promote equal opportunities and safeguard proper working conditions and worker rights.

The [NN Human Rights Statement](#) reflects our commitment to this and sets out our approach to respecting human rights.

NN expects our suppliers to:

- Respect internationally proclaimed human rights as set out in the International Bill of Human Rights, which consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights.
- Have in place a human rights policy, as well as perform regular human rights due diligence process in accordance with the OECD guidelines.
- Comply with minimum wages and working hours in accordance with national laws and ensure compensation of a living wage according to local living conditions.
- Provide safe and healthy working conditions, in accordance with all relevant laws and regulations.
- Ensure all work is completely voluntarily, thus excluding practices such as modern slavery, human trafficking and child labour.
- Respect the right of employees to exercise freedom of association and collective bargaining.
- Enable employees and other stakeholders to report concerns or potentially unlawful practices in the workplace.

Diversity and inclusion

At NN, we care about diversity and are strongly committed to creating a culture that promotes inclusion and equal opportunities for all. Our approach to this is set out in our [Statement on Diversity & Inclusion](#), and we encourage our suppliers to partner with us to rule out all discrimination and achieve excellence in regard to diversity and inclusion.

NN expects our suppliers to:

- Promote a workplace free from discrimination based on gender, sexual orientation, race, colour, disability, religion, political opinion, national and social origin, or any other status.
- Foster a work environment that is free of harassment and where equal opportunities in all employment areas are ensured.
- Promote diversity, inclusion and equity in the organisation; engage everyone and encourage them to be who they are.

- Demonstrate progress to gender equality at all levels of the organisation.
- Ensure equal pay for equal work.
- Document a diversity and inclusion approach, which as a minimum should include commitments to identify, measure and improve diversity and inclusion.

Integrity and ethics

At NN, we recognise the importance of doing business in an ethical manner, and our actions are guided by our values: **care, clear, commit**. The [NN Statement of Living our Values](#) sets the standard for conduct and provides a compass for decision-making.

NN expects our suppliers:

- Not to engage in any illegal or unethical behaviour and uphold standards of fair business practices.
- Not to engage in any type of bribery, not to permit any other party to engage in bribery on their behalf.
- Not offer or accept gifts, sponsorships, and donations whereby there is reason to believe that there may be intent to improperly influence business decisions.
- Not influence or attempt to influence the award of an agreement by directly or indirectly offering and or providing a personal inducement to one or more NN employees.
- Ensure proper handling of confidential, sensitive, and personal information.
- Not allow bias or conflicts of interest that may influence its professional responsibilities.

Monitoring and enforcement

In all areas mentioned above, NN expects suppliers to not only adhere to the outlined standards, but to also encourage these principles actively in their supply chains. Further, we stimulate suppliers to create more impact by undertaking practices beyond these minimum requirements.

By acceptance of the minimum standards set out in this code, you commit that all existing and future relationships with NN Group will be subject to the provisions stated in this document. These principles are minimum standards and do not supersede any provisions made in our contracts. In case of non-compliance, suppliers shall inform their primary NN contact and take measures to meet the requirements set out in the code. If there is no commitment or lack of corrective measures, NN will take this seriously and reconsider the relationship.

Any questions regarding the Supplier Code of Conduct can be directed to:

NN Group Procurement

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