

N-and Group Ltd – SUPPLIER CODE OF CONDUCT

- At N-and, we are committed to standard of excellence in every aspect of our business, to ethical and responsible, conduct in all of our operations, to the respect of the rights of all individuals, and to respect for the environment. We expect the Suppliers who do business with N-and's subsidiaries and with N-and Group, if applicable, to share these same commitments. N-and and its subsidiaries strongly encourage each Supplier to meet the following standards in all activities that relate directly or indirectly to N-and Group or its subsidiaries.
- We will evaluate a Supplier's compliance with these standards in determining whether to grant or continue approved status for such Supplier. Suppliers that not conform to these standards may be disqualified from approved status and/or have their business relationship with N-and Group or the applicable N-and subsidiary terminated.

List of Standards

- Compensation
- Hours of Work
- Coercion and Harassment
- Discrimination
- Workplace Safety and Emergency Planning
- Environmental Protection
- Compliance with Applicable Laws
- Commercial Bribery
- Accounting records
- Conflict of Interest
- Subcontracting
- Monitoring Compliance
- Management System and Communication

Compensation

Supplier must with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, and other elements of compensation, and will provide all legally mandated benefits.

Hours of Labour

Supplier will maintain work hours in compliance with all applicable wage and hour laws and regulations. Supplier will not require employees to work more than any limits on regular and overtime hours allowed by any applicable local law.

Coercion and Harassment

Supplier will treat each employee with dignity and respect, and will not engage in or permit corporal punishment, threats of violence, or other forms of harassment whether based on race, colour, sexual orientation, national origin, religion, disability, age, or any other legally protected characteristics.

Discrimination

Supplier will not discriminate in hiring practices or any other condition of work on the basis of race, sex, sexual orientation, colour, age, national origin, physical or mental disability, religion, status as a disabled veteran, or other legally protected characteristics.

Workplace Safety & Emergency Planning

Supplier will provide a safe and healthy workplace for employees by endeavoring to meet or exceed international safety standards. Supplier must have procedures in place for handling emergencies such as fire, spills, and natural disasters.

Environmental Protection

Supplier will comply fully with all applicable environmental laws, and seek ways to conserve natural resources and energy, reduce waste and the use of hazardous substances, minimize any adverse impacts on the environment.

Compliance with Applicable Laws

Supplier will comply with all laws and regulations applicable to their business, as well as the standards of its industry, including those pertaining to the manufacture, pricing, sale, distribution, labelling, import, and export of merchandise. Without limiting this requirement, Supplier will not:

- A. violate, misappropriate or infringe upon the intellectual property rights of N—and Group, and its subsidiaries or any third party;
- B. engage in any activities which would violate any applicable laws and regulations relating to
 - child labor, forced labor or any forms of slavery and human trafficking in the country or countries in which they are doing business
 - bribery or illegal payments
 - laws against unfair competition
 - unfair and deceptive trade practices,
 - the environment
 - health and safety,
 - international trade, including exports and imports
 - data privacy
 - money laundering
 - employment
 - contracting with governmental entities, or
 - medical devices, if applicable.

Commercial bribery

Supplier will not bribe in any way officer, director, manager, employee, representative or agent of N-and Group, its subsidiaries, or any other entity, including without limitation, by offering or giving kickbacks or by offering or giving gifts of more than normal value.

Accounting Records

Supplier's accounting records must

- be kept and presented according to the laws of each applicable jurisdiction,

- in reasonable detail, accurately and fairly reflect transactions, assets, liabilities, revenues and expenses, and
- not contain any false or misleading entries

Conflict of Interest

Supplier must immediately report to N-and Group, any “conflict of interest” of which they become aware. A “conflict of interest” is any circumstance, transaction or relationship directly or indirectly involving the Supplier in which private interest of any employee of N-and Group or any of its subsidiaries improperly interferes, or even appears to improperly interfere, with the interest of N-and Group and its subsidiaries.

Subcontracting

In addition to any restrictions on the use of subcontractors that are otherwise agreed to between the Supplier and N-and Group, or any applicable subsidiaries, Supplier will make reasonable efforts to communicate this policy to any subcontractors in connection with any N-and Group or subsidiaries business.

Monitoring and Compliance

Supplier understand that N-and Group, its subsidiaries, or our designated agents (including third parties) may engage in monitoring activities to assess compliance with this Code of Conduct including on-site inspection of facilities and review of books and records. Neither N-and Group or any of its subsidiaries or authorized agents assumes any duty to monitor or ensure compliance with this Code of Conduct, and Supplier understand that Supplier is solely responsible for full compliance with this Code of Conduct by its officers, directors, managers, employees, representatives and agents.

Management System and Communication

Supplier must establish and maintain processes that are reasonably designed to ensure compliance with, mitigate the risks identified in, and facilitate continuous improvement with respect to, this Code of Conduct.

Supplier must ensure that this Code of Conduct is adequately communicated to all employees.

Supplier should immediately notify N-and Group via email at <mailto:ethics@n-andgroup.com> upon learning of any known or suspected improper behavior by Supplier or by employees of N-and Group or its subsidiaries.