



Code of Conduct for Suppliers

to NTG

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Introduction by the CEO

NTG is dedicated to being a good corporate citizen in all its operations and solutions.

Responsible behaviour is part of NTG's core values, and customers and other stakeholders all expect NTG to conduct business in a responsible manner.

This Code of Conduct for Suppliers to NTG (the "Code of Conduct") forms the basis of all actions and activities carried out in NTG's name and provides information and guidance on ethical conduct towards various stakeholders.

The Code of Conduct reflects NTG's commitment to act responsibly with all business partners, including the commitment to respect human and labour rights as well as providing guidance on our prohibition towards corruption.

We believe that by focusing on the values as described in this Code of Conduct, NTG will strengthen the relationships with its suppliers and sustainable business relationships will be created.

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.

NTG is a signatory to the UN Global Compact initiative. NTG's policies are based on the ten universally accepted principles within human rights, labour standards, environment and anti-corruption provided in the United Nations Global Compact framework. We encourage all our business partners to support the UN Global Compact initiative.

Thank you for being a responsible business partner to NTG.

Best regards,



Michael Larsen
Group CEO

Scope & responsibility

This Code of Conduct is applicable to all suppliers and business partners who operate with or on behalf of NTG, including hauliers, 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 that our suppliers have established processes and maintain policies and procedures to ensure compliance with this Code of Conduct.

This Code of Conduct applies to the full supply chain of NTG.

Suppliers must ensure, to the greatest extent possible, that the supplier's own business partners also comply with the requirements of this Code of Conduct.



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Anti-corruption and bribery

The definition of corruption is to commit dishonest or criminal acts, like bribery and embezzlement, for personal gain or to obtain a business advantage. It can take place between persons or companies and in individual cases or systematic. Corruption is bad for society and free competition.

NTG is committed to prevent the occurrence of bribery in all activities under our effective control. We expect that our suppliers act in compliance with the anti-corruption laws of the countries in which they operate.

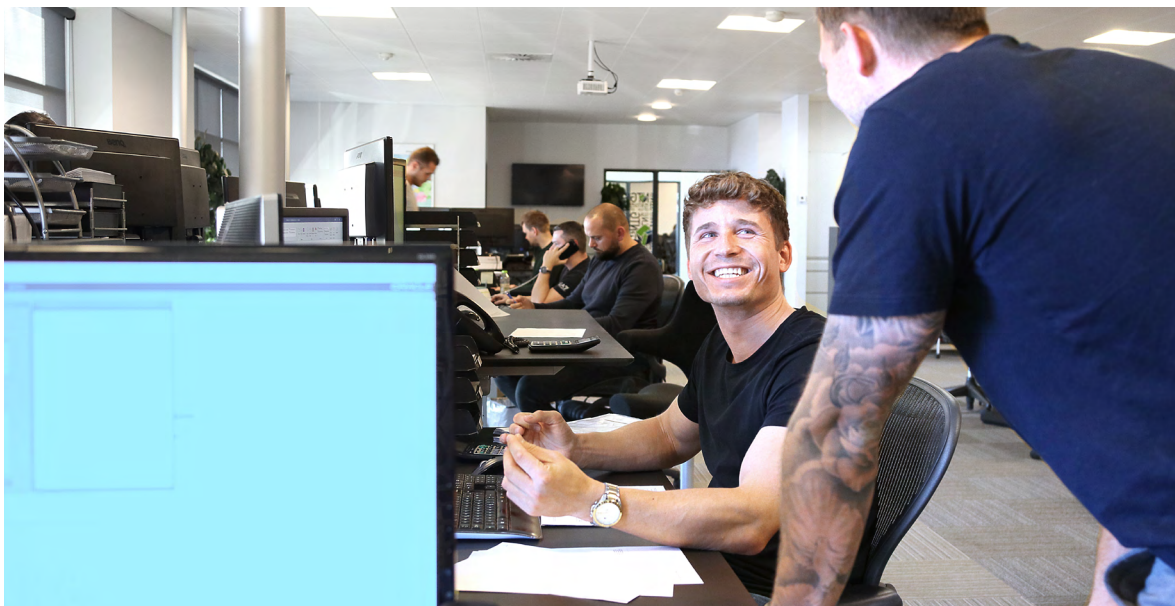
NTG prohibits any offering or accepting of bribes in any form and no matter how small the amount to any person, whether private or public, direct, or indirect, or through third parties.

Facilitation payments

A facilitation payment is a personal payment to a government official or government employee, usually to expedite or ensure the performance of a routine government action the company or person is entitled to anyhow, such as processing of governmental papers or permissions.

NTG's suppliers are not allowed to make or accept facilitation payments regardless of whether it is considered common local practice. NTG will not penalise a supplier for refusing to pay a bribe even if it results in NTG losing a business opportunity. The prohibition of bribery applies without exception, including in relation to activities where our competitors resort to bribery.

The only exception is if the supplier believes that its or another person's life, health or safety may be at risk. In these cases, payment may be made but must be reported to your contact person at NTG.





Conflicts of interest

NTG expects to be informed by its suppliers if any situation could result in a conflict between supplier's personal interest and NTG's interests as a business. If a supplier becomes aware of a potential conflict of interest this must be reported to your contact person at NTG.

Gifts and favors

Giving or receiving business-related gifts and entertainment in connection with building business relationships with or showing appreciation to individuals who are employed by private commercial companies is permissible if it is not done for a corrupt purpose.

Suppliers must not allow gifts and hospitality to influence their objectivity and independence, or cause others to perceive an influence. Suppliers are not allowed to offer gifts or hospitality when it could affect, or be perceived to affect, the outcome of a business transaction. Even gifts of moderate value should only be offered or accepted where this is an accepted business practice.

NTG's suppliers are not allowed to accept or offer cash, or the cash equivalent such as gift vouchers or prepaid cards.

Fair competition and anti-trust

The purpose of competition and anti-trust laws is to promote fair competition between competitors by preventing agreements and practices which have the potential of limiting the free competition.

At NTG, we want open and fair competition and we do not tolerate violation of competition laws and regulations in any jurisdiction. This includes allocation of customers or markets, all kind of cartels, market share or split, disclosure of information to competitors, and coordination of prices or tender offers or any other oral or written price cooperation with competitors. NTG has internal guidelines ensuring non-tolerance towards any such activities. Likewise, we expect our suppliers to counter any illegal practices.

If we detect that any of our suppliers violate competition or anti-trust laws 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.



Foreign Trade Control(s)

NTG respects international and national trade sanctions and embargoes. Foreign trade controls restrict business transactions with certain countries, organisations, and persons. They may take the form of controls on the export or import of certain products or technology; or they may prohibit dealings with certain countries or individuals. It is NTG's policy to comply with these restrictions wherever we seek to do business.

NTG expects that its suppliers comply with all applicable foreign trade control laws and regulations imposed by the United Nations, the European Union, the United Kingdom, the United States of America, or other relevant regulator, which apply to their business or services.



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Human rights

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

No discrimination

NTG expects our suppliers to support equal opportunities for all employees and business partners and to recognise and work actively against discriminatory treatment based on race, gender, religion, age, nationality, sexual orientation, disability, political orientation, ethnic or social background.

Health and safety

NTG is committed to securing a safe and healthy workplace, ensuring employee satisfaction, and providing talent-based advancement opportunities for all employees on an equal and non-discriminatory basis.

NTG expects that its suppliers provide safe and healthy working environments for all their employees. NTG expects that its suppliers have implemented procedures to ensure that they apply with all applicable laws and have taken appropriate measures to prevent the use and abuse of alcohol, drugs, or other unlawful substances by its personnel.

In case of fatal accidents and/or serious injuries which potentially could lead to claims or liability for NTG or NTG's customers, suppliers are expected to report these as soon as possible to their contact person at NTG.





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NTG suppliers which are performing road transport operations within the EU must comply with all the requirements under the EU Mobility Package which includes rules on driving times and rest periods, working hours, posting and cabotage.

Road safety & quality standards

Road safety is an important matter for NTG, our customers and the community in general. 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 always comply with applicable traffic regulations and reduce unnecessary hazards or risks.

All suppliers are expected to ensure that they have implemented appropriate measures to comply with applicable laws and proactively implement any changes in their internal policies to meet changes in any local laws and requirements and be prepared for any disruptions of their business (for example, pandemics, terrorism, natural disasters, cyberattacks).

NTG expects that any equipment used when providing services to NTG is of good and sound quality, meets the general and statutory maintenance standard, and always complies with any safety regulations or measures. Suppliers must ensure that equipment used to provide services for NTG is maintained regularly to ensure that it always complies with applicable environmental requirements and have as low environmental impact as possible.

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.



Environment and climate

As an asset-light freight forwarder, most of NTG's climate impact relates to indirect emissions from transport activities of our suppliers. Collaboration with customers and support from suppliers are therefore crucial elements for NTG's efforts of reducing carbon related emissions.

Our suppliers are expected to comply with all applicable local and international laws and regulations on the protection of the environment and climate. Where reasonable required by NTG, suppliers should support NTG's initiatives to reduce carbon emissions and agree to participate in joint projects related to environmentally friendly solutions and technologies.

NTG expects that suppliers which are performing road transport operations keep idling of their vehicles and other equipment to an absolute minimum and no idling is allowed when the supplier is present at a NTG location for loading or unloading unless necessary to complete the operation.

Hauliers must keep their drivers updated on relevant driving techniques and, to the extent possible, use the vehicles' internal driving mode setting to ensure the lowest possible fuel consumption from the operations.

Processing of information

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.

Confidential or proprietary information may only be disclosed to a third party if authorised in writing through a non-disclosure agreement or if disclosure is required by law.

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 NTG's Group Management.

Data privacy

In the transport and logistics industry, each day vast volumes of data are generated, for example through vehicle locator systems and video surveillance monitoring systems.

NTG collects data about you as a supplier, for example your name, email address and telephone number and we keep a record of our correspondence with you. We do so as this information may form the basis of a contract with you.

NTG complies with data privacy legislation and your information is safeguarded by our information technology system. Personal details are only used and processed to the legally permissible extent required. NTG expects the same standards from its suppliers.



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Compliance with the Code of Conduct

NTG expects that its suppliers always comply with this Code of Conduct and the requirements from this Code of Conduct are in addition to the obligations under contracts agreed between NTG and the supplier.

To ensure compliance with this Code of Conduct audits or inspections may be conducted either directly by NTG or by an independent third party appointed by NTG and without any prior notice.

Reporting violations

NTG encourages you to speak up if you become aware of a breach of law or a serious breach of this Code of Conduct, relating for example to competition law, anti-corruption, foreign trade controls or conflicts of interest.

A breach must be reported to your contact person at NTG or through NTG's whistle-blower system – NTG Speak Up. The information provided via NTG Speak Up is handled in a confidential manner. You may contact NTG

Speak Up from any computer through the internet at <https://eu.deloitte-halo.com/NTG-whistleblower/>

Breach of the Code of Conduct

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

This Code of Conduct is also available at ntg.com. Suppliers are required to familiarise themselves with the content of this Code of Conduct.

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