



Neat Suppliers' Code of Conduct

Neat is committed to conducting business with integrity, transparency, and respect for all individuals and communities. We expect our suppliers, manufacturers, contractors, and business partners (collectively referred to as “Suppliers”) to share these same values. This Supplier Code of Conduct outlines the minimum standards we expect from our Suppliers to ensure ethical, responsible, and sustainable business practices throughout Neat’s value chain.

This Code is based on Neat’s internal Code of Conduct and the principles of internationally recognized standards, including the Universal Declaration of Human Rights and the Responsible Business Alliance (RBA) Code of Conduct.

By working with Neat, suppliers agree to comply with these standards and ensure they are upheld throughout their operations and supply chains.

1. Neat Core Values and Ethical Standards

Transparency

- Suppliers must avoid conflicts of interest in business with Neat. Disclose any potential conflicts immediately.
- Gifts, hospitality, or entertainment offered to Neat employees must be reasonable, infrequent, not intended to gain an unfair advantage, and in compliance with applicable laws and regulations.
- Suppliers must maintain accurate and complete records of all transactions related to Neat.

Trust

- Suppliers must protect Neat’s confidential and proprietary information. Information may only be shared with authorized parties and used for its intended purpose.
- Suppliers must comply with all applicable laws, regulations, and standards in the countries where they operate.

Respect

- Suppliers must uphold the human rights of workers and treat them with dignity and respect, as understood by the international community.



2. Compliance with Laws and Standards

Suppliers must comply with all applicable international and local laws and regulations. This includes respecting human rights and adherence to, without limitation, labor laws, trade control regulations, sanctions regulations, environmental laws, and anti-corruption regulations.

Suppliers are expected to align with:

- [The Universal Declaration of Human Rights](#)
- [The International Bill of Human Right](#)
- [UN Global Compact Principles](#)
- [ILO Core Conventions](#)
 - [ILO C138 Minimum Age Convention, 1973;](#)
 - [ILO C182 Worst Forms of Child Labor Convention, 1999](#)
 - [ILO-IOE Child Labour Guidance Tool for Business, ILO \(2015\)](#)
- [OECD Due Diligence Guidance for Responsible Supply Chains](#)
- [Responsible Business Alliance Code of Conduct](#)

Governance and Oversight

The Neat Board of Directors is responsible for ensuring oversight of this policy. Neat's Leadership Team is accountable for its implementation. The due diligence process is carried out by the Transparency Act Team, mainly consisting of the Supply Chain Operations Team in collaboration with the Sustainability Team.

Any breaches identified through due diligence or ongoing monitoring will be addressed by the Transparency Act Team. Together with the supplier, it is responsible for developing and overseeing a corrective action plan when necessary.

Reports submitted through the whistleblower channel are investigated by the Health, Safety & Environment (HSE) Assessment Team. If the team determines there is no conflict of interest, they will notify the Supply Chain Operations Team and/or the Sustainability Team for further action. Suppliers are encouraged to establish their own grievance mechanisms to complement Neat's whistleblower channel.

3. Labor and Human Rights

Suppliers must not discriminate against any worker based on race, color, age, gender, gender identity, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status.



No Forced or Compulsory Labor

- No use of forced, bonded, or compulsory labor, or human trafficking.
- Workers must not be required to surrender identification, documents, or deposits as a condition of employment.

No Child Labor

- Workers must be at least 16 years old, or older if local laws set a higher age.
- Juvenile workers (ages 16-18) must not engage in hazardous work or night shifts.
- If child labor is found, suppliers must support the child's education until they complete high school.

Harassment and Abuse

- No physical, sexual, psychological abuse, harassment, or coercion.
- Workers must be treated with dignity and respect.
- Suppliers must provide safe ways for workers to raise concerns without retaliation.

Wages and Working Hours

- Pay at least the legal minimum wage or industry standard, whichever is higher.
- Working hours must comply with local laws, not exceeding 48 hours per week, plus 12 hours of overtime if voluntary; shall not exceed 60 hours is total.
- Provide at least one day of rest every seven days.
- Overtime must be compensated.

Non-Discrimination, Diversity, and Inclusion

- No discrimination in hiring, compensation, access to training, promotion, or termination.
- No mandatory pregnancy testing.
- Workers returning from parental leave must be offered their previous or an equivalent position.
- Suppliers must promote diversity and inclusion.

Freedom of Association

- Respect workers' rights to organize, join unions, and engage in collective bargaining.
- No retaliation against workers for exercising these rights.



4. Health and Safety

- Provide a safe and healthy workplace.
- Identify and minimize health and safety risks.
- Ensure access to clean drinking water, sanitation, and emergency exits.
- Provide necessary personal protective equipment and training.
- Monitor air quality and noise levels.

5. Environmental Responsibility

- Comply with environmental laws and regulations.
- Implement programs to reduce energy use, emissions, water consumption, and waste.
- Minimize hazardous materials and ensure proper waste management.
- Disclose environmental impacts, including carbon emissions and material sourcing, upon request.
- Responsible sourcing of materials, including conflict minerals, cobalt, lithium, and others.
- Support with life cycle assessment of the products and materials sourced

6. Business Integrity

Anti-Corruption and Bribery

- Prohibit all forms of bribery, corruption, extortion, and embezzlement.
- Do not offer or accept bribes or improper payments.
- Ensure intermediaries (agents, consultants, etc.) comply with applicable anti-corruption laws.
- Avoid conflicts of interest.
- Suppliers must protect the intellectual property rights of Neat and other third parties

Gifts and Hospitality

- Gifts and hospitality must be modest, infrequent, and not intended to influence business decisions.

Anti-Money Laundering

- It is prohibited to engage in or assist with money laundering or terrorist financing.
- Adhere to all applicable anti-money laundering legislation.
- Remain vigilant regarding any unusual payments, invoicing, banking arrangements, or atypical tax statuses of business partners, suppliers, customers, and others.



Fair Competition

- Only engage in fair, justifiable, and ethically responsible competition.
- Adhere to applicable anti-trust and competition laws.

Sanctions and Trade Control

- Never conduct business with entities and individuals that are subject to sanctions.
- Adhere to applicable sanctions regulations, including Norwegian and EU sanctions laws and regulations.
- Ensure compliance with trade control regulations and obtain necessary licenses where required.

7. Product Quality and Safety

- Maintain a quality management system.
- Ensure products meet Neat's quality standards through testing and inspection.
- Implement continuous improvement plans.

8. Monitoring and Enforcement

- Suppliers must assign a responsible person to ensure compliance with this Code.
- Neat may audit suppliers and request proof of compliance.
- Breaches will result in corrective action plans. In severe cases, Neat may terminate the relationship.

9. Reporting Violations

Concerns or suspected violations of this Code can be reported anonymously via the whistleblower channel on the Neat website. All reports will be treated confidentially.

10. Capacity Building and Training

- Neat encourages suppliers to engage in ongoing training on:
 - Human rights and labor standards
 - Health, safety, and environmental management
 - Anti-corruption practices
 - Responsible sourcing and conflict minerals




- Neat offers collaborative training opportunities for suppliers to improve compliance and sustainability.

Supplier name:	
Date:	
Main contact person: Job title:	
Signee name: Job title:	
Signature & company seal	

This suppliers code of conduct was approved 26th of June 2025 by:

Signed by:


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Janine Pelosi
Chief Executive Officer
Neatframe