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Name	Neat Procurement Policy
Type	Preventive
Domain	ESG Governance
Document Contributors	Erwin Hasselbrinck
Document Owner	Sustainability Manager, Senior
Main Approver	Chief Executive Officer
Additional Approvers	Chief Financial Officer General Counsel Chief Product & Engineering Officer
Electronic File	This document is stored and maintained electronically. If any doubt exists as to the current version, reference should be made to the document owner for verification. Proposed changes/updates must be sent to the document owner.
Audience	This policy applies to all employees of Neatframe Limited ("Neat") and its subsidiaries, with particular emphasis on employees involved in sourcing, purchasing, and supplier management. It should be read alongside the Neat Supplier Code of Conduct.
Review	This document should be reviewed annually to take into consideration relevant updates or changes to requirements
Classification	Public
Approved	V1.0 October 2026

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Neat Responsible Procurement Policy

Version 1.0 September 2026
Review: Annually

1. Scope and Audience

This policy applies to all employees of Neatframe Limited ("Neat") and its subsidiaries, with particular emphasis on employees involved in sourcing, purchasing, and supplier management. It should be read alongside the Neat Supplier Code of Conduct.

2. Governance and Oversight

The Neat Board of Directors is responsible for ensuring adherence to this policy. Neat's Leadership Team oversees its implementation. This policy supports Neat's obligations under the Norwegian Transparency Act (Åpenhetsloven) and the OECD Guidelines for Multinational Enterprises. Purchasing decisions above defined thresholds require approval in line with Neat's internal authorization framework.

3. Our Commitment

Neat is committed to responsible sourcing and to selecting suppliers and partners that share our standards for human rights, labor practices, environmental responsibility, and ethical conduct. We integrate ESG criteria into our sourcing decisions, from initial supplier selection through ongoing supplier management.

4. Core Principles

Neat is committed to:

- Selecting JDM partners and suppliers based on merit, quality, cost, reliability, and ESG performance.
- Including ESG risk criteria in supplier screening, tenders, and contracts.
- Conducting ongoing supplier risk assessments and due diligence in line with our Supplier Risk Assessment Methodology.
- Requiring all primary manufacturing partners and high-risk suppliers, as identified through Neat's risk methodology, to sign the Neat Supplier Code of Conduct.
- Prioritizing JDM partners and suppliers with recognized third-party certifications, such as ISO 9001, ISO 14001, ISO 45001, and ISO 50001.
- Requiring employees involved in procurement to disclose any conflicts of interest.

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5. Supplier Requirements

All suppliers and business partners are expected to comply with the Neat Supplier Code of Conduct, which sets out our requirements for labor, health and safety, environmental responsibility, and ethics, and is grounded in the RBA Code of Conduct. Suppliers that do not meet these requirements are assessed and monitored under our Supplier Risk Assessment Methodology.

6. Addressing Non-Compliance

If a breach of this policy is identified, we will:

- Notify the relevant supplier or partner and require corrective action.
- Collaborate with the supplier to identify solutions and address the breach.
- End the business relationship if corrective actions are not implemented.

7. Policy Review

We review this policy at least annually.

This Responsible Procurement Policy was approved October 2026 by:

Signed by:
Javed Khan
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Javed Khan
Chief Executive Officer
Neatframe