

Code of Ethics for Suppliers



1. Introduction

Noatum is committed to comply with the highest standards of ethics, integrity and social responsibility and expects all Suppliers engaged in providing products and services to Noatum to have a similar commitment.

Noatum has drawn up this Code of Ethics for Suppliers (“Code”), which sets principles and guidelines to be followed by all Noatum Suppliers along its supply chain.

With this Code, Noatum encourages its suppliers and subcontractors to carry out their activities in accordance with best practices, complying with internationally accepted laws and standards regarding transparency and business ethics, human rights, health and safety, fair competition, confidentiality and processing information and environment protection to promote a sustainable economy.

2. Guiding Principles

2.1. Transparency and Business Ethics

Noatum expects its Suppliers to conduct business in an ethical and lawful manner. Suppliers must fully comply with all applicable anti-bribery and anti-corruption laws including but not limited to relevant acts such as the U.S. Foreign Corrupt Practices Act or the UK Bribery Act. Suppliers must not accept or offer bribes of any kind.

Suppliers must comply with applicable laws aimed at combating money laundering and terrorist financing activities. Suppliers must not engage in money laundering or any activity that facilitates money laundering, funding of terrorism. Suppliers shall collaborate and undertake to prevent money laundering and terrorism funding, and they will also take all necessary steps to prevent this risk.

Suppliers must immediately disclose any actual or potential conflict of interest in relation to their activities with Noatum.

2.2. Human Rights

Noatum strongly believes that human rights are fundamental and should be always protected.

Noatum encourages and expects its Suppliers to commit and support principles established in the Universal Declaration of Human Rights and under the International Labour Organisation (ILO) Conventions.

Suppliers shall guarantee fair labor conditions and support equal human rights. Noatum expects Suppliers to, as a minimum, not tolerate any forms of discrimination on the grounds of, including but not limited to, gender, nationality, race, religion, age, or disability. Suppliers must reject all discriminatory practices due to any condition or characteristic in employment and occupational matters and treat their professionals fairly and with dignity and respect.

Suppliers shall reject all forms of forced or compulsory labour and all forms of modern slavery and must adopt within their organisation appropriate measures to eliminate all such practices and promote the adoption of such measures within their supply chain.

Likewise, suppliers shall expressly reject the use of child labour, both within their organisation and in their supply chain, respecting the minimum hiring age limits in accordance with applicable law, and shall have adequate and reliable mechanisms in place to verify the age of their professionals.

2.3. Health and Safety

Health and safety at work is one of Noatum's primary concerns, so it requires that its Suppliers promote a culture of integrated prevention in their organizations to prevent potential occupational hazards. All suppliers must respect any regulations or applicable laws on Health & Safety.

Suppliers must adopt practices to minimize health and safety risks, support accident prevention, and ensure a safe workplace for all workers, including employees and/or contractors and other third parties.

Whenever is needed, Noatum's suppliers shall undertake to comply with and take appropriate measures to ensure that their workers receive the necessary information on Occupational Risk Prevention and Safety and Health, with respect to their subcontracted works.

2.4. Fair competition

Noatum is committed to complying with all applicable competition and anti-trust laws. Suppliers must always respect fair competition and avoid any practice that may entail unfair competition.

2.5. Conflict of interest of suppliers

Suppliers must maintain mechanisms ensuring that the supplier's independence of action and full compliance with applicable law will not be affected in the event of a possible conflict of interest between the interest of the supplier and the personal interest of any of its professionals.

2.6. Confidentiality and protecting information

Suppliers must respect and protect the confidentiality of information belonging to Noatum. Suppliers are not allowed to disclose any confidential or proprietary information received during or after its collaboration with Noatum to unauthorized individuals or any external parties.

Information owned by the companies of the Noatum Group and disclosed to the supplier shall, as a general rule, be deemed to be confidential or secret information. The information provided by suppliers to their contacts within the Group's companies shall be true and shall not be given with the intent to induce any deception.

Noatum requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information.

Suppliers and their respective professionals shall be responsible for adopting adequate security measures to protect the non-public information owned by the companies of the Group and have the means necessary to safeguard it.

2.7. Environment

Suppliers must comply with all applicable laws and regulations relating to the environment. In conducting their business, suppliers must look for and to the extent possible offer sustainable services aimed at reducing the environmental impact. Suppliers must at all times advocate respect for the environment, the minimum consumption of natural resources and the reduction of their environmental impact.

3. Subcontractors

Suppliers are responsible for ensuring that all its subcontractors comply with the principles set in this Code.

4. Agreement

In all current and future business relations between Noatum, Suppliers will be asked to accept and comply with the principles set out in this Code.

Suppliers contracting with companies of the Group shall expressly accept the rules of conduct set forth in this document.

5. Reporting concerns

Suppliers are encouraged to be alert to and show vigilance in situations that could result in misconduct.

Noatum has implemented an internal reporting system to that end, to facilitate the reporting of possible irregular conduct or potential unlawful acts or acts contrary to the law.

The Noatum whistleblowing system is an anonymous and confidential channel, hosted by an independent third-party operator, that third parties can access through Noatum's website.

Any conduct that goes against the principles of this Code or against current legal provisions should be reported through the whistleblowing channel.

Noatum whistleblowing channel may also be used to submit any comment and query related to this Code and its guiding principles.



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