

**NORBEC**<sup>TM</sup>

# CODE OF ETHICS AND CONDUCT



FOR SUPPLIERS

# OUR VISION

We are a North American leader committed to achieve sustainable growth by being a trusted partner and providing innovative solutions focused on our customers' needs. We'll reach our goals with motivated employees and an unshakeable willingness to continuously improve everything we do.

# OUR MISSION

Our mission is to contribute to a sustainable world by manufacturing high-performance insulated solutions.

# PREFACE

This Code of Ethics and Conduct for Norbec Suppliers (hereinafter referred to as the "Code") applies to all suppliers of Norbec. The term "supplier" refers to any organization, including its representatives, shareholders, affiliated companies, directors, employees, accredited representation agents, and subcontractors where applicable, that provides goods or services to Norbec.

The Code outlines Norbec's expectations of its suppliers with whom it maintains business relationships. Suppliers are responsible for ensuring compliance with the Code for their subcontractors, accredited representation agents, or other business partners.

During their business relationships with Norbec, suppliers must act in accordance with Norbec's values and code of conduct, as well as the laws and regulations in force in their countries of origin.

## **OUR VALUES: CLIENT EXPERIENCE, RESPECT, COLLABORATION, COMMITMENT, INNOVATION**

Client Experience: Quality and customer satisfaction are the basis for everything we do, at every step of our business.

Respect : We treat our customers, colleagues, associates and suppliers with respect, because they are an integral part of our success.

Collaboration: Teamwork is important to us, both internally and externally. We are open to opinions and enjoy working closely with our staff. We want to have fun while growing and being the best.

Commitment: Our employees are essential to the success of the company, and we rely on their accountability, well-being and safety to achieve optimal results. Norbec is aware of its roots and values the proximity of people and the human aspect.

Innovation: We listen to the needs of our customers in order to offer them innovative solutions that will help them achieve their goals, and we aim to constantly reinvent the way we do things.

# CODE OF CONDUCT

## **Conflict of Interest**

Any conflict of interest and any situation that may create a conflict of interest affecting the impartiality of Norbec employees in the business relationship must be reported to Norbec promptly upon becoming aware of such conflict.

## **Collusion and corruption**

Any act or participation in collusion, any conspiracy, agreement, or arrangement to fix prices with other suppliers or aimed at or having the effect of reducing competition, as well as any arrangement that could hinder the normal course of the business relationship between Norbec and its suppliers, including any form of passive and active corruption, extortion, bribery, personal benefits, bid rigging, influence peddling, obtaining privileged information, embezzlement, and falsifications are prohibited and strictly forbidden. Norbec expects the supplier to apply the same standards within its own company.

## **Participation in Criminal Organization Activities**

The supplier agrees not to associate or participate, directly or indirectly, in activities of a criminal organization. These activities include, among others but not limited to, money laundering, trafficking of illicit substances, and recycling of proceeds of crime. The supplier must also work against corruption in all its forms, including extortion and bribes.

## **Obstruction**

Any act or omission aimed at preventing or obstructing Norbec in its verifications regarding possible Code violations is prohibited and strictly forbidden.

## **False or Misleading Statements**

Any false, deceptive, or misleading statement in the context of the relationship between the parties, including during a payment request, bid solicitation, or any similar process, is also prohibited.

### **Gifts, Donations, and Invitations**

No goods, favor, service, benefit, invitation, or gift that could be seen as a potential source of conflict of interest can be accepted by Norbec employees without authorization from their superiors or management. If a gift is accepted, it must be given to the immediate superior to be drawn later among all the company's employees.

It is important to note that offering an advantage to an employee by a supplier should have no connection to past or future purchases by Norbec, and the advantage offered by a supplier to an employee should not in any way be based on volume or replace a discount that Norbec would receive on the price of a product or service.

Furthermore, suppliers are required to refrain from responding to solicitations from Norbec employees for donations or contributions to personal causes. Solicitation from Norbec for charitable causes and organizations is permissible. The Supplier's participation would not bind Norbec to purchase any goods or services from the Supplier.

### **Business Relationships**

Suppliers must be honest, professional, and fair in their business relationships with Norbec, especially concerning the procurement process, during which they must accurately account for their ability to fulfill all obligations of their commitments.

### **Health and Safety**

Suppliers must adhere to health and safety standards in compliance with applicable laws and regulations to ensure safe and healthy working conditions for all their employees. Additionally, they must take appropriate measures to prevent work-related injuries and accidents.

### **Fight Against of Forced Labour and Child Labour in the Supply Chain**

Norbec expects its suppliers and their subcontractors to take the necessary steps to identify, prevent and mitigate the risk of forced and child labour at every step of their production and supply chain.

## **Environment and Sustainability**

Suppliers must comply with environmental laws, regulations, and standards in the countries where they operate and strive to reduce the impacts of their activities and products on the environment. They should promote the adoption of necessary measures to prevent pollution and efficiently conserve and use natural resources required for their operations while encouraging the development and dissemination of environmentally friendly technologies.

## **Respect**

Suppliers must treat Norbec's customers, employees, and partners with courtesy and fairness in all forms of communication and interaction.

## **Confidentiality**

Suppliers must protect Norbec's confidential information they hold or have access to. Confidential information includes any non-public information of Norbec, its customers, and its employees.

Suppliers must not use confidential information except for the purpose of fulfilling their mandate, and they cannot disclose or share it with a third party without prior consent from Norbec. These obligations apply throughout the duration of the business relationship and persist after the termination of contractual commitments or until such information becomes public.

## **Cybersecurity**

Suppliers must safeguard and protect any information provided by Norbec from unauthorized access, destruction, use, modification, or disclosure. The supplier must have risk-based cybersecurity programs designed to mitigate threats in their information systems, products, services, and supply chain while complying with all applicable contractual and legal requirements.

# APPLICATION OF THE CODE

## **Supplier Governance and Commitments**

Each Norbec supplier is responsible for ensuring that the rules of conduct outlined in this Code are respected and that mechanisms for managing compliance are in place within their company. It is also the suppliers' responsibility to take necessary measures to address any deviations.

For reference, Norbec expects its suppliers to provide a copy of this Code to their employees who have a business relationship with Norbec.

## **Sanctions**

Any violation of the Code may result in sanctions by Norbec, ranging from a simple warning to a notice requiring the supplier to rectify any non-compliance, rejection of proposals from the supplier, conditional awarding of contracts, or even contract cancellation and termination due to the supplier's default, all at the discretion of Norbec.

# SUPPLIER COMMITMENT FORM

I confirm that I have received a copy of Norbec's Code of Ethics and Conduct for Suppliers, that I have read and understood its content, and that my company agrees to comply with it.

I certify that, to the best of my knowledge, my company is in compliance with Norbec's Supplier Code.

Signature : \_\_\_\_\_

I have the authority to bind the company (as an owner, executive, or authorized signatory).

Name : \_\_\_\_\_

Title : \_\_\_\_\_

Organization: \_\_\_\_\_

Date: \_\_\_\_\_





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