

Distributor Code of Conduct

Our approach

Nordic Unmanned sets a high standard for the way we do business. We are committed to safe, responsible, and sustainable business, which seeks to contribute positively to society, people, and the environment. Our commitment to prevent and address negative impacts on people and the environment that may arise in the context of our business, includes a full value chain approach, focusing not only on our own activities but also on our supply chain and our business relationships.

We expect our distributors to adhere to the same minimum standards of responsible business conduct.

At a minimum, we expect distributors to comply with all relevant legal and industry requirements for product safety, climate and environment, human rights, HSEQ, anti-bribery and business ethics, and global minimum standards for responsible business conduct as set out in the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles (the “UNGP”) on Business and Human Rights and International Labour Organisation’s (the “ILO”) Core Conventions.

Responsible and sustainable distribution requires action and collaboration across tiers. Together with the industry, we are striving to make our business as sustainable as possible. We therefore seek to work with distributors that share these commitments to responsible conduct and to keep searching for sustainable solutions.

Our expectations are set out in the code of conduct for distributors, in addition to the provision of any commercial terms agreed between Nordic Unmanned and the distributor.

If we identify breaches of our expectations, we will engage in dialogue. Lack of follow-up or sustained breaches may lead to termination of the distributor agreement.

We also expect that our distributors disseminate these expectations in their own company culture by requiring the same minimum standards.

Code of conduct and key expectations

This Code of Conduct is applicable to all distributors and partners.

Distributors must comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries outside their home country in which operations are managed, or services are provided. This includes complying with economic sanctions and embargoes, governing the export and transfer of parts, components, and technical data and services. Distributors shall provide truthful and accurate information and obtain import and export licenses as necessary.

A. Product safety and quality

We expect our distributors to comply with all laws and regulations on product safety and quality whilst delivering products and/or services to end clients.

We expect distributors to have in place quality assurance processes, which also includes quality to the sales process.

B. Human rights and decent work

Respect for human rights and international labour standards (core ILO standards) for decent work are globally agreed minimum standards that apply to all businesses. We expect distributors to adhere to the UNGP on Business and Human Rights and meet their responsibility to respect human rights,

which means preventing and addressing negative impacts on workers and other directly affected stakeholders resulting from their business operations. This includes providing a living wage; protecting the health, safety, and welfare of workers; respecting freedom of association; prohibiting harassment, bullying and any form of discrimination at the workplace, including gender discrimination and sexual abuse; and prohibiting any form of forced labour, modern slavery, human trafficking, and child labour. It also includes preventing and addressing adverse environmental impacts that may harm the health and livelihood of affected workers and communities.

Distributors are expected to identify risks and actual adverse human rights impacts related to their activities and business relationships. They should take appropriate steps to reduce risk and ensure their operations do not contribute to human rights abuses, and remedy any adverse impacts directly caused or contributed to, by their activities or business relationships. We expect distributors to request their own suppliers to carry out human rights due diligence in line with the UNGP.

As required by the Norwegian Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the "Norwegian Transparency Act"), Nordic Unmanned will publish an account on our human rights due diligence. Also, as required by the Norwegian Transparency Act, we provide information about our human rights due diligence if requested by external parties.

Nordic Unmanned human rights policy:

<https://nordicunmanned.com/app/uploads/2022/07/Human-rights-policy.pdf>

C. Anti-bribery and anti-corruption

Distributors must comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business regardless of any local customs. This includes compliance with anti-corruption laws that may have extra-territorial application.

We expect distributors to conduct appropriate due diligence to prevent and address bribery and corruption in all business arrangements. This includes avoiding any form of "facilitation" payment.

Distributors must not offer or receive gifts that breach applicable laws, regulations, rules and standards. If offering gifts or hospitality, this must be done in an open and transparent way and must never be illegal. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business decisions.

Nordic Unmanned policy on anti-bribery and corruption

<https://nordicunmanned.com/app/uploads/2022/07/Anti-corruption-policy.pdf>

D. Climate and the environment

All distributors have a responsibility to reduce their environmental footprint and work toward zero harm to the environment. We expect distributors to conduct their business in a manner that actively manages environmental risks and impacts across their operations, products, and supply chain. We expect distributors to comply with the requirements of applicable environmental legislation and commit to international goals for safeguarding the environment, including achieving net-zero and protecting air, waters, and land.

Distributors are expected to have in place an appropriate environmental management system, including policies and procedures aimed at effectively managing their environmental risks and impacts. This includes measures to improve efficiency of the energy, water, and natural resource usage, minimize the use of and waste from hazardous materials, reduce the use of plastic and minimize

plastic waste, recycle materials as much as practically possible, and reduce greenhouse gas and other harmful emissions.

Meeting this code of conduct

We expect distributors to make this Code of Conduct available to relevant employees and contractors. If we identify breaches of the requirements in this Code of Conduct, we will engage in dialogue with the distributors. Nordic Unmanned reserves the right to terminate contracts if serious breaches are not addressed or in the event of reoccurring serious breaches of this Code of Conduct.

In case of identified risks or concerns relating to this Code of Conduct, we expect distributors to notify us immediately. Concerns can also be made by distributors and others through our grievance mechanism. Reports may be sent by email or made anonymously through a dedicated electronic form:

<https://nordicunmanned.centrik.net/SMS/Case/ExternalReport.aspx?ReportingSubsystemId=cee1d686-b32a-4d3e-835c-285f72195805>

All reports are handled by our HSEQ and legal team and treated confidentially. We will not accept any discrimination or retaliation against individuals who raise compliance concerns in good faith.

Link

ESG in NU:

<https://nordicunmanned.com/app/uploads/2022/07/ESG-in-Nordic-Unmanned.pdf>