



CODE OF CONDUCT

February 25, 2025
Version 2.0



NORDTREAT'S CODE OF CONDUCT

Nordtreat's reputation as a responsible company is based on a set of principles regarding our behaviour towards employees, shareholders, customers, suppliers, authorities and all of the people living and working in environments protected by Nordtreat's solutions around the world.

In our work, we contribute to the UN's Sustainable Development Goals. We are also committed to the principles of the UN Global Compact, UN Guiding Principles on Business and Human Rights, the International Labour Organization's fundamental conventions, as well as the OECD guidelines for multinational companies.

The contents of this Code of Conduct are based on the above principles and clarify what each Nordtreat employee and contractor can expect of their colleagues.

This Code of Conduct applies to all employees of Nordtreat Group Inc., its subsidiaries and contractors.

Vantaa Finland, February 25, 2025.

Signed by:

A handwritten signature in black ink, appearing to read 'Outi Kallio', enclosed within a blue rounded rectangular box.

1A8BB6F8633450...

Outi Kallio

Chief Executive Officer
Nordtreat Group Inc.

Mission, Vision and Values

Our mission, vision and values form the foundation for everything we do at Nordtreat.

OUR MISSION

We enable the growth of the future construction sector by supplying bio-based, regulations-compliant flame retardant solutions with minimised environmental impacts.

OUR VISION

We bridge the price, ease of use and sustainability gap between flame retardants and regular coatings.

OUR VALUES

Maximising customer satisfaction

In everything we do, we always think of how to make our customers' life easier when interacting with Nordtreat's team, products and solutions. If you can do something for the customer to make their job easier, you should.

Offering the best possible products and solutions

Whenever we can take the extra step to make our products and services better, we should. A strive for excellence in products is not only limited to research and development but extends to everything from the speed and clarity of communication to the product packaging and choice of logistics partner.

Candour

In our multicultural work community, we value honest interaction with coworkers, customers, suppliers and other stakeholders alike. This way, we help and learn from others. We believe that this key factor separates the

most successful companies from the rest. We act whenever we recognise an opportunity to improve our operations.

Our commitments

As a global technology- and services supplier Nordtreat has an impact on many communities around the world. We strive to ensure that all our operations are carried out in a socially responsible and globally aligned manner.

We are committed to principles such as

- UN Global Compact and Sustainable Development Goals
- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD's Guidelines for Multinational Enterprises

Labour and Human Rights Commitment

We are explicitly committed to upholding the fundamental rights of all individuals in our operations and supply chain. This includes:

- Respecting freedom of association and the right to collective bargaining.
- Ensuring no individual is subjected to forced labour, child labour, or any form of discrimination in respect of employment and occupation.

These commitments are guided by international standards, including the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

Business and sustainability principles

Transparent by nature

Our customer promise describes what we stand for: transparency and sustainability. We aim to accelerate the transition to a more sustainable

construction sector by increasing transparency within our field of business.

We do this by providing information on our sustainability performance transparently and openly.

Sustainable products and services

We are committed to providing our customers with products and services that are safe, efficient and reliable.

We continuously strive to improve the energy- and resource efficiency of our solutions and operations.

We offer our customers product life-cycle support and services which ensure the best long-term environmental performance of our products and solutions.

We educate and encourage our customers to use the products they purchase from us in environmentally responsible ways.

We encourage all of our personnel to participate in innovating and finding ways to reduce the environmental impact of our products and services.

Compliance with laws and regulations

We strive to comply with all applicable laws and regulations when conducting our business. Laws concerning occupational health and safety, equality, non-discrimination, privacy, bribery and corruption, competition, environmental protection, and product and food safety are of particular significance.

People, society and environment

Respect for human rights

We must respect and comply with all internationally recognised human rights and promote human rights in practice.

Equal opportunities, diversity and discrimination

We must treat each other and our partners equally and enable equal opportunities for all employees. Discrimination of any form is not tolerated, which includes discrimination based on gender, religion, age, ethical background or race.

We appreciate diversity in our employees' backgrounds, talents, insight, education and experience. We believe this contributes to our success and sustainability by enhancing innovativeness, flexibility and the ability to communicate with our stakeholders.

Labour rights

We are obliged to comply with national laws and to respect all internationally declared labour rights. When national laws are incompatible with international standards, we should attempt to find ways to comply with international standards as well.

We are required to treat our employees fairly, equally and with respect. We must also respect all employee's personalities, dignity and health, safety, privacy, freedom of religion and conscience.

We guarantee our employees the freedom of association and the right to collective bargaining and the rights not to be subject to forced labour, child labour or discrimination in respect of employment and occupation.

Working time and wages

Working time must comply with national legislation and applicable collective agreements.

Wages, benefits and overtime compensation must comply with national legislation and applicable collective agreements. Any deduction from wages as a disciplinary measure is prohibited.

Health and Work Safety

We must comply with all national laws and all applicable international standards. When national laws are incompatible with international standards, we must attempt to comply with international standards.

We should also actively work to prevent accidents and injuries. All work-related injuries and illnesses must be prevented to the best of the employer's capability. We must also actively find solutions to ensure the enjoyment of the health of its employees.

We must comply with Nordtreat's safety requirements when working at or visiting Nordtreat's premises and carry out necessary safety training.

We shall respect the right of all employees to freely and voluntarily establish and join organisations of their own choice in accordance with national laws and collective agreements.

Bribery and anti-corruption

Any form of bribery or corruption is not tolerated. This includes any promise of payment or payment of bribes and illegal payments to the authorities or other parties or any advice or incitement to anyone to offer or accept them.

Any form of money laundering, financing of terrorism or other illegal activities, or unlawful restrictive trade practices are strictly prohibited.

Fair Competition and compliance with anti-trust legislation

We are required to comply with all applicable competition and anti-trust laws. No illegal or restricting business methods are accepted.

Conflicts of interest

We require our employees and contractors to notify without delay of any condition that could be perceived to be in conflict with Nordtreat's interests. A conflict of interest can also include but is not limited to, personal benefits and benefits to an employee's or contractor's family.

Forced labour

No form of bonded labour, forced labour or labour with fear of punishment is permitted. Employees must work at their own will for compensation, and employees should be free to leave and change their employment when they wish. For example, taking or withholding employees' passports is prohibited.

Child Labour

Child labour is not permitted in any operations of Nordtreat. Child labour is considered work carried out by a child under 15 years of age or under 14 years of age in those countries specified in Article 2.4 of ILO Convention 138. Any hazardous work shall not be conducted by an individual under the age of 18.

Gifts and hospitality

We must comply with all laws and applicable regulations issued on giving and accepting gifts, and applicable standards are assessed in accordance with the legal requirements of each jurisdiction. Any gifts or hospitality accepted or given by Nordtreat's employees or contractors must be of low value.

Environmental responsibility

We understand the environmental impact of our work and how we contribute to our mission to convert renewable resources into sustainable results.

We integrate sound environmental management principles and practices into all aspects of our business.

We focus on continuously improving our operations' efficiency and reducing our value chain's environmental footprint in accordance with best practices.

For example, our operations must not pollute the ground or water sources. For example, our operations must ensure appropriate handling of waste,

record their water discharges and emission into the air, and attempt to minimise waste and environmental impacts.

Remedy

Nordtreat is committed to remedying the adverse impacts on individuals, workers, communities and the environment that it has caused or contributed to.

Principles of Remedy

Our approach to remedies aligns with international human rights standards and includes:

Restitution

Restoring the situation to what it was before harm occurred where possible.

Compensation

Providing fair and appropriate compensation for damages caused.

Rehabilitation

Offering necessary support for individuals impacted, including access to medical, psychological, or other assistance.

Satisfaction and Guarantees of Non-Repetition

Implementing measures to prevent future harm and provide assurance to affected stakeholders.

Communication and reporting misconduct

Communication and reporting misconduct

We encourage our employees and stakeholders to speak up and voice their concerns. Employees are encouraged to contact their supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation.

Employees are responsible for reporting any violations of our Code of Conduct to their manager or members of the management team of the company.



Employees and other stakeholders may report suspected violations of our Code of Conduct through Nordtreat's grievance form:
<https://www.nordtreat.com/en/grievance-form>

Implementation

If the content of our Code of Conduct is incompatible with legislation, applicable laws and regulations take precedence. This Code of Conduct is a wide-ranging but not exhaustive document. Nordtreat's policies, together with guidelines and instructions, provide further guidance on how the different areas are to be handled. Every employee and contractor is personally responsible for understanding and acting in accordance with this Code of Conduct and Nordtreat's policy documents. This Code of Conduct is available on Nordtreat's website.

All managers are responsible for ensuring that their employees are familiar with this Code of Conduct.