



NEWTRACKS

OSLO - SHENZHEN

CODE OF CONDUCT

BUSINESS PARTNERS

February 14, 2025

Introduction

NewTracks specializes in design, product development, and production for electronics and demanding industries. We turn product ideas into reality and strengthen Norwegian industry by delivering high-quality components and finished products. Our customers span a wide range of sectors, including agri- and aquaculture technology, telecommunications, lighting and security.

We are committed to conducting business with integrity, transparency and respect for human rights, labor standards, and environmental sustainability. We focus on ensuring fair and good working conditions, choosing environmentally friendly transport options, and using recycled materials in products and packaging.

This Code of Conduct is based on internationally recognized principles and sets forth our expectations for all suppliers, partners and subcontractors.

Business Ethics

NewTracks expects all suppliers to adhere to the highest ethical standards and comply with all applicable laws and regulations.

Specifically, suppliers must:

- **Prohibit Corruption and Bribery:** Refrain from offering, accepting or soliciting bribes or any form of improper advantage.
- **Fair Competition:** Conduct business in a fair, open and competitive manner.
- **Accurate Reporting:** Maintain accurate financial records and disclose relevant business information honestly and transparently.
- **Conflicts of Interest:** Avoid situations where personal interests could conflict with business obligations.
- **Confidentiality:** Protect all confidential information related to NewTracks and its partners.
- **Data Privacy and Protection:** Ensure that all personal and business data is handled responsibly, securely and in compliance with relevant data protection laws and regulations. Suppliers must take necessary measures to prevent unauthorized access, loss, misuse or disclosure of sensitive data.

Human Rights and Labor Standards

NewTracks firmly believes that all individuals deserve to be treated with dignity, fairness, and respect, regardless of where they are in the world. NewTracks does not tolerate any form of modern slavery and human trafficking and we expect our suppliers to commit to acting ethically and with integrity in all their business dealings and relationships. We are committed to working only with Business Partners who demonstrate a genuine and proactive approach to upholding human rights laws. If any concerns arise regarding compliance, we will conduct thorough human rights due diligence to assess and address potential risks.

- **No Forced or Child Labor:** Suppliers must not use any form of forced, bonded or child labor
- **Fair Wages and Working Hours:** Provide wages, benefits, and working hours in accordance with applicable laws and industry standards. Overtime work should be voluntary, and employees must receive fair compensation for any extra working hours.
- **Non-Discrimination:** Ensure equal opportunities and prohibit discrimination based on gender, race, ethnicity, religion, disability, sexual orientation or any other protected status.
- **Freedom of Association:** Respect employees' rights to freely associate, organize and bargain collectively without retaliation
- **Harassment-Free Workplace:** Maintain a workplace free from harassment, abuse and any form of inhumane treatment.
- **Alcohol and Drugs:** Ensure a workplace free from the influence of alcohol and drugs that may impair safety, performance or decision-making.
- **Responsible Sourcing of Minerals:** Suppliers must source raw materials responsibly, avoiding conflict-linked or human rights-violating activities. They must keep records of material origins and manufacturing location
- **Operating Permits and Legal Compliance:** Suppliers must ensure that all necessary operating permits, licenses and regulatory approvals are in place, valid and available for review upon request.

Environmental Responsibility

Protecting the environment and biodiversity, combating climate change, and fostering a culture of circularity are integral to responsible business practices. Suppliers must actively work to reduce their environmental footprint throughout their operations and value chain.

- We expect our suppliers to take measures to minimize resource consumption, including energy, water and raw materials, while also striving to prevent pollution, limit noise levels and enhance overall environmental performance.
- Sustainable waste management practices should be implemented, focusing on reducing, reusing and recycling materials wherever possible.
- All chemicals and hazardous materials must be properly labeled, safely stored, and disposed of in compliance with local and international regulations.

Health & Safety

NewTracks is committed to systematically ensuring health and safety in the workplace. A safe and healthy working environment is fundamental to the well-being of all employees and workers in our supply chain. Suppliers must take proactive measures to provide a safe workplace and continuously improve health and safety standards.

Suppliers must:

- **Workplace Safety:** Implement effective health and safety policies to prevent accidents and injuries.
- **Health monitoring:** Suppliers must conduct regular health monitoring for employees exposed to potentially harmful work conditions.
- **Protective Equipment:** Provide employees with comprehensive training on workplace hazards and ensure they have access to appropriate protective gear. Enforce proper PPE usage where required.
- **Safe Machinery Operation:** Suppliers must ensure that all machinery is operated safely and responsibly. Machines must be fitted with appropriate guards, emergency stop buttons and regularly maintained to prevent workplace hazards.

- **Emergency Preparedness:** Establish procedures for fire safety, medical emergencies and natural disasters.
- **Hygienic Facilities & Living Conditions:** Suppliers must provide adequate, hygienic facilities for workers, including access to clean drinking water and sanitary restrooms. If living accommodations are provided, they must be safe, clean, and adequately ventilated.
- **Material Safety Data Sheets (MSDS):** Suppliers must maintain updated material safety data sheets for all hazardous chemicals, ensuring they are understandable to employees and accessible at the point of chemical use.
- **First Aid & Medical Facilities:** Suppliers must ensure that first aid and medical facilities are available on-site and that trained personnel are accessible to handle medical emergencies.
- **Accident Reporting & Records Maintenance:** All workplace accidents must be reported, handled in a timely manner and documented to ensure continuous safety improvements.

Compliance and Monitoring

NewTracks reserves the right to assess suppliers' adherence to this Code of Conduct through audits, inspections and self-assessments. Non-compliance may result in corrective actions, up to and including termination of the business relationship.

Reporting Violations

NewTracks encourages employees and subcontractors to report any violations of these ethical guidelines, including concerns related to compliance with Chinese regulations or the Norwegian Freedom of Information Act. Reports can be submitted without fear of retaliation.

By signing this Code of Conduct, the supplier acknowledges its commitment to uphold these principles and work collaboratively with NewTracks to ensure responsible business practices.

CODE OF CONDUCT

Date: _____

Supplier Name: _____

Authorized Signature: _____

Position: _____

Contact Information

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