



Supplier Code of Conduct

Hanover, 23.02.2026

Preamble

As the bank of the energy transition, NORD/LB is committed to ecologically, socially and ethically responsible corporate management. We expect our suppliers, service providers and other contractors ("Suppliers") to consider the same principles in their own business activities and along their supply chains. The Code is the basis of our cooperation and complements the contractual agreements.

The Supplier Code of Conduct is primarily aimed at direct suppliers. We expect direct suppliers to pass on the requirements to their own suppliers, subcontractors and other vicarious agents on a risk-based basis and to promote compliance appropriately.

Scope and terms

This Code applies to all suppliers of NORD/LB as well as to companies affiliated with the supplier within the meaning of Sections 15 et seq. of the German Stock Corporation Act (AktG) (insofar as they are involved in the provision of services) and to companies that provide services as subcontractors within the framework of the business relationship. The supplier shall ensure that the requirements of the Code are known within the company and are implemented in an appropriate manner.

"Supply chain" includes all products and services of a supplier as well as the upstream stages (direct and indirect suppliers), insofar as the supplier can influence them or has to increase their ability to exert influence.

Frame of reference

The Supplier Code of Conduct is based, among other things, on the Supply Chain Due Diligence Act (LkSG), the UN Guiding Principles on Business and Human Rights, the ILO Core Labour Standards, the UN Civil and Social Covenant and the OECD Guidelines for Responsible Supply Chains.

1. Requirements for suppliers

1.1 Social responsibility and human rights

- Respect for internationally recognised human rights and effective measures to prevent and minimise human rights risks.
- Prohibition of child labour: compliance with ILO core labour standards; no employment of persons under the minimum age permitted by law; Protection of young workers.
- Prohibition of forced labor and modern slavery: No forced labor, debt bondage, human trafficking or involuntary labor; no withholding of identity documents.
- Non-discrimination and equal opportunities: No discrimination on the basis of, among other things, gender, age, origin, religion/belief, disability or sexual orientation; Protection against harassment and violence.
- Fair pay and working hours: At least compliance with statutory minimum wages and social benefits; working hours in accordance with applicable law; equal pay for equal work or work of equal value within the framework of the applicable laws.

- Freedom of association and collective bargaining: respect for freedom of association within the framework of applicable laws; no discrimination against employee representatives.
- Health and safety at work: compliance with national occupational health and safety regulations; appropriate protective measures, training and emergency preparedness.
- Use of security forces: Assignment/use only with appropriate selection, instruction and control; no disproportionate force, torture or degrading treatment.

1.2 Environmental responsibility

- Compliance with environmental law: compliance with national legal norms as well as relevant international standards; Preventing, minimizing and ending environmental risks.
- Environmental management and continuous improvement: Establishment/maintenance of an effective environmental management system and energy management.
- Greenhouse gases, air emissions and noise: Recording of significant emissions, reduction measures and use of renewable energies.
- Water and wastewater: monitoring and treatment of wastewater, reducing water consumption and avoiding harmful discharges.
- Waste and hazardous materials: Safe handling, storage and disposal; Compliance with relevant international conventions (e.g. Minamata, Stockholm Convention, REACH Regulation).
- Resource efficiency and circular economy: process optimisation, recycling/reuse, sustainable choice of materials and— where relevant — recyclable packaging.
- Biodiversity and natural resources: avoiding significant damage to soils, forests and ecosystems; Compliance with relevant permits.

1.3 Economic and ethical responsibility

- Legal Compliance: Compliance with all applicable laws, regulatory requirements, and relevant standards. Compliance with applicable EU sanctions and export control regulations; no business relationships with listed persons/organizations.
- Integrity and anti-corruption: zero tolerance for bribery, corruption, extortion, breach of trust and money laundering; adequate internal controls and training.
All suppliers are required to have anti-corruption policies and programs.
- Fair competition: compliance with antitrust and competition law; no price, condition or market-sharing agreements.
- Conflicts of interest: Disclosure of potential conflicts in relation to the business relationship with the NORD/LB.
- Confidentiality, data protection and information security: protection of confidential information; The Supplier shall ensure that personal data is processed in accordance with the law, as well as appropriate IT and information security measures.
- Protection of intellectual property: Protection of IP and know-how rights of third parties and NORD/LB.
- Note: If special regulatory requirements apply (e.g. banking supervision, outsourcing, information security), these must also be met.

Implementation & Cooperation in the Supply Chain (LkSG)

2.1 Risk management, prevention and documentation

- The supplier shall establish appropriate processes to identify, assess and address risks and violations of the expectations described in this Code in its business area and, where possible, in the upstream supply chain.
- The supplier implements risk-based preventive measures (e.g. guidelines, training, supplier requirements, controls) and documents them in a comprehensible manner.

The Supplier shall inform NORD/LB immediately if it becomes aware of any actual or potential violations of the principles, requirements or obligations set out in this Supplier Code of Conduct that affect the business relationship or the supply chain and shall provide appropriate evidence (e.g. proof of training, certificates) upon request.

2.2 Control and Audit Measures (Information and Audit Rights)

In the event of a violation or reasonable suspicion of a violation of the principles, requirements or obligations set out in this Supplier Code of Conduct, NORD/LB shall be entitled to obtain risk-based information and to carry out appropriate controls to ensure the effectiveness of the implementation of this Code. This includes, among other things, self-disclosures/questionnaires, document checks.

- The supplier grants an appropriate right to information, information and inspection of relevant documents and processes, to the extent legally permissible.
- Inspections can be carried out by NORD/LB employees or by third parties commissioned by NORD/LB. The supplier's legitimate confidentiality and data protection interests are guaranteed, and external auditors are obliged accordingly.
- If the supplier can already provide suitable external certifications or test reports (e.g. B. ISO 14001/50001/45001, SA8000), these can be taken into account – if appropriate – but do not replace the supplier's own care.

2.3 Grievance mechanisms and protection against discrimination

The supplier ensures that employees and potentially affected parties along the supply chain have access to an effective, confidential and fair complaint and whistleblower system. The supplier indicates available reporting channels, encourages use and protects whistleblowers from discrimination or retaliation.

3. Dealing with violations, remedial action and escalation (LkSG)

In the event of violations of this Supplier Code of Conduct, NORD/LB expects an immediate and appropriate remedy. The supplier actively participates in the clarification and implementation of measures.

- **Notification and remedy:** After written notification, the supplier is generally given a reasonable period of time to remedy the situation.
- **Remedial concept:** If a short-term termination is not possible, the supplier (if necessary together with affected subcontractors) creates a remedial concept with a concrete schedule and measurable milestones.
- **Temporary suspension:** NORD/LB may suspend the business relationship appropriately during the implementation of remedial measures.
- **Termination (ultima ratio):** In the event of very serious violations, lack of remedy despite a timetable and if no milder means are available, NORD/LB may terminate the business relationship in whole or in part extraordinarily. Statutory and other contractual rights remain unaffected.

- NORD/LB can include suppliers in an internal blacklist in the event of serious or repeated violations.