northvolt Supplier Code of Conduct

Northvolt AB and subsidiaries

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1. Introduction

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Northvolt AB ("Northvolt") was established with a clear mission: to build the greenest batteries in the world with a minimal carbon footprint and the highest ambitions for recycling. Our products are designed to accelerate the transition to a decarbonized future and, as an organization, we know that our way of conducting business will play a crucial role in making this green transition more inclusive and ethical.

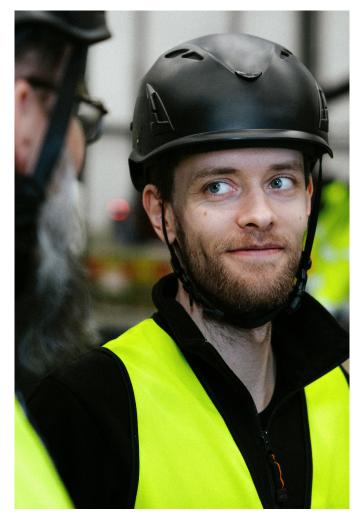
Northvolt is committed to respecting the highest standards for human rights, environmental responsibility and ethical conduct in our operations and through our business relationships, including our supply chain. Through this commitment, we believe we can help advance our contribution to sustainable development

The Supplier Code of Conduct (the "Code") highlights what we stand for and sets clear expectations for our supply chain partners on how to fulfil our vision. The Supplier Code of Conduct is owned by the Head of Sustainability, and has been formally adopted by the Board. This policy is of utmost importance to our corporate governance strategy.

The Supplier Code of Conduct seeks to align to the principles of UN Global Compact, International Bill of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, ILO Basic Terms and Conditions of Employment, UN Guiding Principles for Business and Human Rights (UNGPs), OECD Guidelines for Multinational Enterprises and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

2. Who this code applies to

Northvolt's Supplier Code of Conduct applies to all suppliers, contractors and sub-contractors of goods and services (hereinafter referred to collectively as "Suppliers").



3. Roles, responsibilities and disciplinary action

Suppliers shall ensure that their operations are not only in full compliance with all applicable laws and regulations, but that they also adhere to the internationally recognized sustainability standards listed in the Introduction section above. This means that the Suppliers shall have implemented due diligence systems in line with these international standards.

If there are discrepancies between national laws and the terms of the Supplier Code of Conduct, Suppliers must adhere to the higher requirements. Should any requirement in this Code conflict with the national law in any country or territory, the law must always be followed. In such cases the supplier must notify Northvolt immediately, before signing this Code.

The Supplier Code of Conduct sets specific conditions that allows Northvolt to evaluate the social (including human rights), environmental and governance performance of our Suppliers and their supply chain. Northvolt may at any time demand that Suppliers complete and report a self-assessment and reserves the right to conduct audits on Suppliers and their supply chain regarding compliance to the Supplier Code of Conduct and any agreed upon corrective action plan.

Suppliers are responsible for conducting business responsibly throughout their own value chain. In case of non-compliance, including withholding audit rights or failing to meet any agreed upon commitment, Northvolt reserves the right to terminate the contract immediately.

Northvolt encourages Suppliers to continuously improve as they strengthen their efforts to implement effective due diligence systems in line with the expectations of the UNGPs and the OECD Guidelines for Multinational Enterprises. A successful implementation of the Supplier Code of Conduct requires an effective due diligence system which would include policy commitments, embedding of those commitments across the organization including through designation of roles and responsibilities, identifying risks, engaging with stakeholders, preventing and addressing risks, tracking performance, communicating about efforts, and enabling access to remedy where negative impacts have occurred.

4. Human rights

Northvolt is committed to doing business with respect for all internationally recognized human rights in its own operations and across its business relationships. It acknowledges potential and real risks related to human rights that in particular are associated with the battery value chain. Northvolt's responsibility is to identify, prevent, address, track, communicate and enable access to remedy for risks and impacts to human rights and the environment throughout our value chain, in line with the UNGPs and OECD Guidelines for Multinational Enterprises.

Suppliers shall have a human rights policy or committment that sets out the supplier's commitment to do business with respect for human rights across its own operations and value chain, in line with the UNGPs and the OECD Guidelines for Multinational Enterprises.

Freedom of Association and the Right to Collective Bargaining

Suppliers shall respect the right of workers to freely and without interference or retaliation establish and join unions or worker representation and to bargain collectively.

Forced Labor

Suppliers shall ensure that they do not engage in any form of forced, bonded, compulsory, trafficked, modern slavery or non-voluntary labor.

Suppliers shall provide all workers with a written contract that clearly conveys the conditions of the employment in a language understood by them. Suppliers shall only engage workers who are legally entitled to work in the country, and shall ensure that all workers (including sub-contractors) have applicable legal documents and work permits to evidence that they are legally entitled to work in the country. Supplier shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities. Suppliers shall not withhold workers' original identification or travel documents.

Workers shall never be required to pay the Supplier or agent a fee or cost for uniforms, personal protective equipment of other expenses need for employment. If such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Child Labor and Young Workers

Child labor is not tolerated in any form. Suppliers shall only employ Workers who are at least 15 years of age, or the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest.

Supplier may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

Suppliers may employ young workers who are older than the applicable legal minimum age but younger than 18 years of age, provided they do not perform work that might jeopardize their health, safety or morals, consistent with ILO Minimum Age Convention No. 138. Suppliers shall not require juvenile workers to work overtime or perform nighttime work.

Suppliers should demonstrate management of child labor risks and impacts, including remediation where they have caused or contributed to negative impacts, in policies, procedures and practices. It is of the highest importance to always protect children from being forced into harmful work.

Wages and Benefits

Suppliers shall pay wages and benefits at a minimum according to applicable laws, industry standards and relevant collective agreements, whichever is highest. Wages for a regular working week (not including overtime pay) shall always be sufficient to meet basic needs of personnel and to provide some discretionary income. The level of wages shall reflect the level of skills and qualifications of regular working time regardless of gender, national background, or other personal characteristics. Overtime should be paid according to local regulation. Suppliers shall pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure. Pay structure and pay periods shall be communicated to all workers.

Non-Discrimination

Suppliers shall not discriminate based on race, caste, ethnicity or national origin, age, gender, sexual orientation, gender identity and expression, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices.

Working Hours

Suppliers shall ensure that a regular working week is in accordance with the provisions of ILO Convention 1. Overtime should be voluntary and be restricted to the specifications defined in ILO conventions. The Supplier must give breaks, annual paid leave and one day off every week unless a collective agreement defines exceptions.

Harassment

There shall be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor the threat of any such treatment.

5. Health and safety



Occupational Health and Safety Management

Suppliers shall ensure that working conditions are safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazard.

Suppliers shall obtain, keep current, and comply with all required health and safety permits. Suppliers shall provide and maintain a safe work environment and integrate sound health and safety management practices into their business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

Suppliers shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment. Suppliers shall provide a safe and healthy environment in order to prevent workplace accidents and injuries. Occupational exposure to potential safety hazards and emergency situations shall be controlled through proper design, risk assessment, engineering controls, safe work procedures, emergency plans and response procedures, and mandatory trainings. Suppliers should implement a Health & Safety Management System, including accident and near accident reporting.

Facilities and onsite accommodation for employees must safeguard individuals' dignity, hygiene and safety. Their conditions must comply with national laws and international health and safety standards.

6. Environment

Producing the world's greenest battery is at the core of Northvolt's mission and competitive advantage. We continuously assess our processes and our suppliers play a critical role in achieving our environmental and circularity ambitions. Our Environmental Requirements can be found in Annex 1.

Environmental Responsibility and Management Systems

Suppliers shall maintain an effective environmental policy and environmental management system, consistent with ISO 14001 or EMAS, that promotes environmental responsibility and enables continuous improvement of their environmental performance and impact. Northvolt reserves the right to ask for evidence of, and the possibility to audit, the environmental management system.

Climate

ASSESSING IMPACTS, RISKS AND OPPORTUNITIES

Suppliers shall assist Northvolt in the evaluation of the products and services they deliver, including all data to perform life cycle assessment as well as end of life scenarios to follow. In addition, suppliers shall provide information regarding their carbon footprint and calculation methodology.

Suppliers shall develop appropriate metrics and targets to measure climate performance, including but not limited to the annual corporate greenhouse gas (GHG) emissions (covering GHG protocol scopes 1, 2 and 3), product GHG intensity or use of renewable energy. Where this information is not publicly available, Northvolt may request annual climate performance data.

Suppliers shall conduct a climate risk assessment or climate scenario analysis of the facilities and supply chain relevant for Northvolt's products. The climate risk assessment shall be in line with the methodology of the Taskforce for Climate-related Financial Disclosures (TCFD) and include Climate Physical Risk and Climate Transition Risk categories of the TCFD. Suppliers shall notify Northvolt of any potentially severe risks identified through the risk assessment and of any steps taken to minimize identified risks. Suppliers shall share the outcome of the assessment with Northvolt upon request.

DECARBONIZING OPERATIONS AND VALUE CHAIN

Suppliers shall strive to reduce the climate impact of their operations and value chain. Suppliers shall implement and control effective actions to reduce their reliance on fossil fuels. Renewable energy shall be prioritized. Northvolt may communicate supplier specific decarbonization targets in contracts with suppliers and third parties.

Resource Efficiency and Circularity

Suppliers shall implement and control effective actions to reduce their use of energy, water, raw material and packaging materials. Suppliers shall implement a circularity perspective to minimize use of virgin materials as far as possible.

Emissions and Waste Handling

Suppliers shall control and implement actions to reduce emissions to air, water and waste of all types. Waste handling management for hazardous and non-hazardous material must be developed and monitored.

Protection of Biodiversity

Suppliers shall protect natural ecosystems and seek opportunities for biodiversity conservation linked to their activity. Suppliers must understand the connections that its business may have with biodiversity loss and, as relevant, act to safeguard biodiversity. Suppliers shall develop appropriate metrics and targets to measure performance.

Material Compliance

Suppliers shall ensure that the products delivered to Northvolt fulfill legal requirements, do not contain banned or restricted substances, and are accompanied with correct documentation, such as a Safety Data Sheet for chemical products.

In addition, suppliers shall declare information regarding the chemical composition of the materials and products according to the Northvolt List of Declarable and Restricted Substances. Full material declarations shall be shared with Northvolt when requested.

7. Ethics



As provided for in Northvolt's anti-corruption policy (the "Anti-Corruption Policy") Northvolt has a zero-tolerance policy towards any and all forms of bribery, corruption, extortion, money laundering, and embezzlement. Suppliers shall adhere and reject all corrupt practices, including but not limited to facilitation payments and receipt or giving of gifts. Suppliers are responsible for ensuring that their employees, subcontractors and other representatives comply with the Anti-Corruption Policy when acting in relation to, or on behalf of Northvolt. The Anti-Corruption Policy is available at https://northvolt.com/articles/code-of-conduct/.

Personal interest or relationships shall not influence Suppliers in decision making. Suppliers shall be proactive in managing potential conflicts of interest in collaboration with Northvolt. All business dealings should be transparently performed and accurately reflected in Suppliers' financial records. Standards of fair business, advertising and competition should be upheld. Suppliers shall provide notification to Northvolt of counterfeit product(s) when warranted.

Privacy

Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with.

Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

Responsible Sourcing of Minerals

As part of their broader human rights and environmental due diligence, Suppliers shall exercise due diligence on relevant minerals and relevant materials in their supply chain, which at a minimum includes conflict minerals (tin, tantalum, tungsten, gold), and battery minerals (cobalt, nickel, lithium, manganese, graphite). In line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Suppliers shall take effective measures to reasonably assure that minerals in the products, parts, components, and materials they produce do not directly or indirectly harm human rights or contribute to conflict. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to Northvolt upon request.

Whistleblowing and Grievance Mechanisms

Suppliers are expected to provide or cooperate in remedy in cases where they have caused or contributed to harming human rights or the environment, in line with the expectations of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. In cases where Suppliers are directly linked to identified harm, they should take a role in enabling access to remedy.

As part of this expectation, Suppliers shall establish an operational-level grievance mechanism that fulfills the effectiveness criteria set out in Principle 31 of the UN Guiding Principles on Business and Human Rights. As set out in the commentary to that Principle, Suppliers shall take effective steps to ensure that individuals who raise a concern – including in a "whistleblower" fashion – shall not fear negative repercussions or any other form of reprisal due to having raised the concern.

8. Implementation of the Supplier Code of Conduct



Suppliers shall ensure compliance with this Code and implement appropriate management systems to do so. Northvolt encourages Suppliers to continuously improve their management systems related to the areas described in the Code.

Suppliers are expected to regularly report to Northvolt regarding their ongoing due diligence efforts, including risk findings and performance. This may be accompanied by an audit initiated by Northvolt.

A suspected breach of this Supplier Code of Conduct shall be reported to a manager at Northvolt or via Northvolt's Whistleblowing system in accordance with Northvolt's Whistleblowing Guidelines available at <u>www.northvolt.com/articles/whistleblowing/</u>

Annex 1: Environmental Requirements

	Type of Supplier		
These requirements apply to Suppliers (including contractors and agents) of equipment, materials and chemicals, parts and components and services.	Equipment	Materials & Chemicals	Part & Components
Environmental impact – Company level			
Environment Policy and Environmental Management System in compliance with or equivalent to ISO 14001.	\checkmark	\checkmark	\checkmark
Measuring, documenting and, upon request by Northvolt, reporting on: * Energy consumption (MWh), intensity (consumption per unit produced), and sources. * Water consumption (m3) and intensity (consumption per unit produced). * Emissions to air, water and land as well as procedures for treatment/abatement. * Waste for disposal and recycling (mt.), including hazardous and non-hazardous classifications. * Carbon footprint (mt. CO2 eq. according to the Greenhouse Gas Protocol "GHG" – Scope 1 and 2) and the calculation methodology.	\checkmark	\checkmark	\checkmark
Environmental impact – Product level			
Compliance with Northvolt's General Technical Specifications	\checkmark		
Northvolt's Equipment Energy Balance template and Utility Matrix template (links)	\checkmark		
Material balance diagram with clear boundary definitions & potential emissions to air, water, land and work environment within the scope in which they operate, emissions points (including from continuous operations, storage & maintenance) and levels without abatement.	>		
Upon request, carbon footprint (CO2 eq. according to the GHG Protocol) associated with the manufacturing of the product and the calculation methodology or provide the information necessary for its calculation.	\checkmark	\checkmark	\checkmark
Upon request, partners shall provide information for a Life Cycle Assessment ("LCA") according to ISO 14040/14044.	\checkmark	\checkmark	\checkmark
Material compliance			
Safety Data Sheets in compliance with EU and applicable national regulations.		\checkmark	
Full material declaration, if requested.	\checkmark	\checkmark	\checkmark
Compliance with the registration, notification, labelling or any other requirement in REACH EC 1907/2006, RoHS EC 2011/65 and CLP EC 1272/2008, as amended.	\checkmark	\checkmark	\checkmark
Compliance with "Northvolt List of declarable and restricted substances".	\checkmark	\checkmark	\checkmark
Due diligence process according to the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals.	\checkmark	\checkmark	\checkmark
Obligation to inform			
Inform, without delay, if a significant environmental incident occurs as a result of the execution of activities for or on behalf of Northvolt.	\checkmark	\checkmark	\checkmark