

# Supplier Code Of Conduct

## INTRODUCTION

PNO's core is based on a clear purpose: Lead the transition to sustainable freight. We have a clear ambition to be a leader within our industry making sustainable profit, always having People, Planet & Profit integrated in all interactions with customers, suppliers, employees, governments and the public.

Our Code of Conduct is a framework of how we work, and our suppliers are required to acknowledge and commit to the adherence of responsible business principles of the Code. We assess our suppliers' compliance with the Code through a combination of self-assessments and documentation reviews. Suppliers should address any gaps in the implementation of this Code by establishing and implementing a time-bound improvement plan in close dialogue with PNO. We expect our suppliers to develop and implement relevant processes, appropriate for a company of their size and industry to ensure compliance with applicable laws and regulations and the requirements of the Code. Where the standards in this Code differ from local and national laws as well as international standards, we expect our suppliers to apply the stricter standard. In the event of standards in this Code conflicting with local and national laws as well as international standards, we encourage our suppliers to address such conflicts to us in order to jointly establish the most appropriate course of action.

The underlying objective of this Code is to establish a basis for positive development of responsible practices through regular dialogues and ongoing working relationships. However, in the incident of severe violations of the Code, we reserve the right to take actions including and up to termination of contracts.

Our suppliers are also required to implement the principles and standards of this Code or similar internationally recognised standards to their own business partners, including suppliers, contractors and joint venture partners.

Implementing a Code of Conduct reflects our commitment to the B Corp (<https://bcorporation.net/>) framework and understanding of the UN Global Compact.

## 1. REPORTING CONCERNS

Our suppliers must have a reporting system to ensure that employees can voice grievances anonymously and without fear of reprisals on any aspect of this Code. All grievances should be investigated in a fair manner. We do not tolerate retaliation against persons making reports in good faith.

You can report concerns through PNO's Whistleblower system which is administered by an

independent company Whispli and it is available 24 hours a day:

<https://pnorental.whispli.com/Anonymous-Reporting>

## **2. BUSINESS ETHICS - OVERVIEW**

PNO's suppliers are required to conduct their business by adopting the highest standards of ethical behaviour. Suppliers should:

- Avoid participation in or knowingly benefit from, any kind of corruption, extortion or bribery
- Adhere to applicable anti-corruption and anti-bribery laws, directives and regulations that govern operations in the countries in which they operate
- Avoid facilitation payments and work towards eliminating it
- Adhere to anti-trust and other competition laws
- Disclose any potential or actual conflict of interest to PNO
- Adhere to national and international foreign trade control laws
- Exercise quality and sustainability due diligence when designing, manufacturing, and testing products
- Adhere to data privacy laws and comply to contractual requirements on confidentiality and information security

## **3. PRINCIPLES OF WORKING AND EMPLOYMENT PRINCIPLES - OVERVIEW**

At PNO we are committed to creating and sustaining a working environment where our team is treated with dignity and respect. We require our suppliers to also adopt and enforce similar workplace practices. Where local laws dictate any additional requirements, those will be applicable along with the requirements mentioned below. Suppliers should respect internationally recognised labour and human rights standards as defined in the principles of the United Nations Global Compact and the B Corp framework. Suppliers should:

- Respect all applicable laws, regulations and international standards related to labour practices and protection of human rights
- Ensure equal treatment and refrain from discrimination of any form, including on grounds that are prohibited in national laws and international standards
- Commit to a workplace free of harassment and abuse, and not use, or permit the use of, corporal punishment or other forms of mental or physical coercion, sexual harassment or abuse, nor execute threats of such treatment
- Respect the rights of their employees to associate freely, join or not join trade unions and/ or workers' councils, and engage in collective bargaining in accordance with national laws and international conventions
- Ensure employment terms are clearly understood by workers and are explained verbally or provided in a written contract in a language they understand, as per local regulations and aligned to the provisions of this Code as a minimum

- Comply with appropriate working hour requirements including overtime, breaks, and rest periods – as established by national law, relevant collective agreements and international standards
- Adhere to relevant national laws, industry standards and international standards relating to minimum wages; overtime wages, and legally mandated benefits
- Adhere to relevant national laws, industry standards and international standards for paid sick leave, paid annual leave and paid parental leave
- Ensure collection and further processing of employees' personal data are done in compliance with the applicable data privacy legislation and best practices.

#### **4. ENVIRONMENTAL PRINCIPLES - OVERVIEW**

At PNO we require our suppliers to integrate environmental considerations in their operations and strive for continuous improvements to minimise any adverse impacts on the environment. Suppliers should:

- Comply with all relevant local and national environmental laws as well as international standards, obtain and maintain all the necessary environmental permits, approvals and registrations
- Develop and implement effective environmental management systems and processes that support identifying risks, measuring and monitoring performance (we also use the B Corp framework), and driving continual improvements to minimise environmental impacts emanating from its operations
- Promote environmentally friendly technologies and processes in their own operations and across the supply chain
- Commit to proactively undertake initiatives to protect the environment from harm and degradation in relation to their operations

##### **4.1 ENVIRONMENTAL PRINCIPLES - NET ZERO BY 2030**

On a holistic point of view, PNO expects suppliers to take a complete lifecycle into account, whilst having an ambitious approach to making improvements to meet Net Zero by 2030. It is in the interests of everyone that we actively play our part in systematically reducing the emissions to avoid a climate catastrophe. PNO has joined the Net Zero 2030 initiative, and we have committed to reducing our carbon emissions in line with what climate science says is necessary to limit global warming to 1.5°C above pre-industrial levels.

#### **5. HEALTH AND SAFETY - OVERVIEW**

Our suppliers are required to provide a safe, secure and healthy working environment for all of their workforce.

Suppliers should:

- Develop and implement effective health and safety management systems

- Ensure that safety management systems support identifying risks, measuring and monitoring performance, and driving continual improvements to minimise health and safety risks emanating from its operations
- Ensure compliance with applicable laws, regulations and customer requirements
- Ensure protection of the workforce by providing basic personal protective equipment appropriate to the nature of work and relevant training on health and safety systems
- Empower workers to report unsafe practices without fear of reprisal
- Commit to proactively undertake safety initiatives to protect people and assets from harm and damage.

## **6. WORKING CONDITIONS - OVERVIEW**

We are committed to creating an environment where employees are treated with dignity and respect. We require our suppliers to also incorporate respectful workplace practices. Where local laws dictate any additional requirements, those will be applicable along with the requirements mentioned below. Suppliers should respect and adhere to internationally recognised labour and human rights standards as defined in the principles of the United Nations Global Compact. Suppliers should:

- respect all applicable laws, regulations and international standards related to labour practices and protection of human rights
- ensure equal treatment and refrain from discrimination of any form, including on grounds that are prohibited in national laws and international standards
- commit to a workplace free of harassment and abuse, and not use, or permit the use of, corporal punishment or other forms of mental or physical coercion, sexual harassment or abuse, nor execute threats of such treatment;

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