



Code of conduct

NILFISK



Global leader in sustainable cleaning equipment

Since 1906, Nilfisk has been on a mission of producing and selling professional cleaning products of the highest quality worldwide. Today, Nilfisk offers an extensive range of premium cleaning products and is a trusted aftermarket service-provider to the professional market and consumer products. We are a global company, operating in over 40 countries, with 4,700 employees and our products are sold in more than 100 countries.

In the beginning of 2022, Nilfisk launched Business Plan 2026 to embark on a strategic journey focusing on long-term, sustainable growth. The starting point is Nilfisk's distinct customer-value propositions; we stand for lifecycle services, customer-centric innovation, and ambitious sustainability commitments as we are committed to decarbonize our business across scope 1, 2 and 3 to lead the industry with sustainable cleaning products. In addition,

we continue building and developing our new Ways of Working, knowing that it is our people, who bring the value proposition to life for our customers.



Our commitment to integrity

Global markets are essential to our success, and Nilfisk respects the diverse cultures, customs, and values of each individual society. At the same time, Nilfisk must comply with many global laws, and follow certain global standards of behavior expected of responsible companies. In order to accomplish this, Nilfisk must have one standard of business behavior applicable to every Nilfisk company.

This Code of Conduct provides that behavioral standard, and its key message is simple: we will always act with integrity by being honest, fair, and accountable for our actions. This is what we expect of every Nilfisk colleague, and it reflects our expectations of business partners throughout the entire value chain.

We recognize that in some places where we operate, laws against corruption or discrimination may be weak, or rarely enforced, and that standards of health, safety, and environmental protection may be rudimentary. Such concerns are irrelevant when it comes to implementing our Code of Conduct – we act with the same level of integrity, no matter where we operate. This Code sets the minimum requirements we expect all employees to follow, even if local laws set lower standards.

The Code of Conduct is also a message to Nilfisk's customers, investors, and other key stakeholders, assuring them of our commitment to integrity – honesty, fairness, and accountability.

Of course, Nilfisk complies with the many laws applicable to our activities, such as laws on anti-corruption and data privacy. But we have also chosen to adopt a growing number of commitments and standards of behavior exceeding legal requirements, such as: committing to create a diverse and inclusive workplace that ensures merit-based equal opportunities for employees; applying science-based actions to reduce our impact on our climate and the environment; and respecting human rights throughout the value chain. We also follow rigorous international standards to produce and supply safe, reliable, high-quality products. We want to be at the forefront, recognizing that today's standards often

become tomorrow's laws.

This Code of Conduct sets out Nilfisk's key principles and objectives governing legal compliance, sustainability, information security, and certain regulatory matters, and provides guidance on how each of us must act. It makes clear that how Nilfisk obtains business is as important as actually obtaining business, and underscores that managers', at all levels, must make integrity a key topic of their agendas. I want to make it clear that fostering integrity is equally important to me as is increasing revenue, launching innovative products, providing good customer service and sustainable solutions. We are all responsible for Nilfisk's integrity.

The Code of Conduct is also a message to Nilfisk's customers, investors, and other key stakeholders, assuring them of our commitment to integrity. We know that our success depends on all our stakeholders' continued confidence in Nilfisk.

If you suspect that the Code of Conduct is not being followed, please report your concern immediately to your manager, HR partner, Corporate Affairs' global compliance team, or me. If you feel uncomfortable reporting concerns internally, please use Nilfisk's whistleblower system. You have my full support in raising any legitimate concern. Likewise, persons outside Nilfisk should also report such concerns to their contacts at Nilfisk or through the whistleblower system.

All employees must use – and follow – the Nilfisk Code of Conduct in their daily work. I am confident that you will take responsibility for it, and discuss it with colleagues, and that managers will drive its integration into global operations.

I am proud to lead a company that has adopted this Code of Conduct, and equally proud to work among colleagues who make the Code a part of their daily work.

Jon Sintorn – CEO





Content Code of Conduct



Integrity policy

Having earned respect in global markets for over a century, Nilfisk is committed to integrity. This means that we act with honesty and fairness, and that we are accountable for our actions.



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This Code of Conduct is part of the employment terms for every Nilfisk employee. As such, both the Code of Conduct and the guidelines supporting it must be followed.

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Nilfisk's Code of Conduct comprises a single policy document that sets out our key objectives and principles. Further, the Code of Conduct comprises eleven specific Rules covering major areas of legal compliance, quality and safety, information security, and Sustainability (corporate social responsibility (CSR)). Further, Nilfisk incorporates compliance and sustainability requirements in the Code into supplier agreements, thereby enhancing our commitments to global goals, principles and legislation, e.g. the UN Global Compact (UNGC) and UK Modern Slavery Act. The eleven specific Rules are supported by internal guidelines providing details about Rule topics, explaining how the Rules are implemented.

The Code of Conduct is part of the broader Nilfisk Governance Framework, which also includes operational Rules. In addition to guidance documents, the framework includes practical tools, e.g. guidelines for conducting risk assessment, assurance actions to assess the status of Code of Conduct behavior implementation, and annual reporting to senior leadership and members of the Board of Directors.

The Code of Conduct also supports Nilfisk's Business Plan 2026 (BP26), our strategic roadmap focusing on long-term, sustainable growth. It establishes global behavior standards, simplifying and clarifying rules and processes to empower employees and enhance strategic execution. Managers' drive the integration of the Code of Conduct into the daily work, just as they drive the broader implementation of Business Plan 2026.

This document sets out Nilfisk's continuously evolving scope of business-behavior standards, and how we act with integrity to achieve them - today and in the future.



Integrity policy

Having earned respect in global markets for over a century, Nilfisk is committed to integrity. This means we act with honesty and fairness, and that we are accountable for our actions.





Nilfisk is committed to complying with applicable laws and regulations around the world. Further, we share our data and disclose ratings within multiple international Environmental, Social and Governance (ESG) and Sustainability frameworks and standards, e.g. EcoVadis, CDP, the Science-Based Targets initiative, Sedex and the UNGC, for use by all stakeholders.

We work with the **UN Sustainable Development Goals (SDGs)** by focusing on those most impacted by our operations. We put our respect for fundamental Human Rights into practice through this Code of Conduct, and by adhering to e.g. the UN Guiding Principles on Business and Human Rights, the International Labor Organization’s Declaration on Fundamental Principles & Rights at Work, the UK Modern Slavery Act, and other relevant guidelines from the Organization for Economic Cooperation & Development.

Moreover, Nilfisk wants to lead the cleaning industry with sustainable products and therefore seeks to promote stricter international product standards, and requirements, and initiates joint standardization efforts when this is feasible from a business and responsible-manufacturing perspective.

Nilfisk’s Code of Conduct consists of an Integrity Policy and specific Rules, underscoring our compliance commitment to

e.g. anti-corruption initiatives, data privacy, competition, foreign-trade controls, fraud, environment and climate protection, productcertification, and human rights, including labor rights, diversity, and inclusion. These Rules are supported by guidelines on how to implement the Rules respectively in the daily operations.

Nilfisk’s employees, managers, and Board members shall: comply with both this Code of Conduct and with guidelines applicable to their work; participate in all relevant, required training; and cooperate with the global compliance and other relevant teams during audits and investigations.

Nilfisk’s compliance and Sustainability activities are based on the Code of Conduct, which, together with Nilfisk’s Human Rights Policy and other related Sustainability policies, sets out how managers, and employees, should behave globally. The Code of Conduct also describes the behavior Nilfisk expects from business partners, especially dealers, joint venture partners, and parties supplying goods or services. Senior leadership approves and supervises the activities and programs governed by the Code of Conduct and receives regular updates. Status reports on certain programs are submitted quarterly to Nilfisk’s Audit Committee, and annually to its Board of Directors. Nilfisk reports publicly on its Sustainability and compliance activities, adhering to applicable laws and standards. Access the reports here: www.nilfisk.com/global/about-nilfisk/sustainability/.

All levels of our global management will actively promote our actions governing compliance, quality, regulatory, information security, and sustainability, placing them high on the agenda and supporting employees in integrating them into daily work. It must be clear that how we obtain business is as important as is obtaining it, and that employees are never expected – or permitted – to deliver results that cause them to act without integrity. We should all be proud of how we behave in our work every day.

Anyone may contact the immediate manager, HR partner or Nilfisk’s global compliance team in Corporate Affairs with questions or concerns. Anyone who is uncomfortable reporting a concern directly may instead use Nilfisk’s whistleblower system.



Nilfisk’s objectives under its Code of Conduct include:

- Integrating integrity – honesty, fairness, and accountability – into our daily work.
- Ensuring a safe, healthy workplace that prohibits harassment and discrimination, while ensuring equal opportunity.
- Embracing and promoting diversity and inclusion, reflecting our global workplace and marketplace.
- Working to reduce our own negative impact on the environment and the climate – as well as that of our customers.
- Mitigating negative impacts from our operations and value chain, whenever material and feasible.
- Deriving new business opportunities through responsible behavior that demonstrates our integrity.

To achieve these objectives, Nilfisk is committed, through its activities and programs, to:

- Apply a materiality- and risk-based approach to compliance, quality, information security and sustainability, as well as employees reporting their concerns, focusing on effective, pragmatic and practical actions.
- Prevent, detect and investigate improper activities.
- Integrate the Code of Conduct into our global activities and strategies, subject to local legal requirements.
- Inform about and/or train employees, business partners, and other stakeholders, in the Code of Conduct.
- Set targets and objectives for continuous improvement.
- Monitor implementation status, e.g. through internal audits, and informing about relevant accomplishments and challenges.
- Work with business partners to integrate the Code of Conduct throughout our value chain, e.g. in supplier audits.
- Work diligently, alone and with third parties, to resolve key compliance and Sustainability challenges.
- Ensure production and delivery of safe products that comply with legal requirements and global standards.



RULE #1

Anti-corruption

Bribery means offering or giving anything of value to anyone, expecting that they will:

- a. **Do something they are not supposed to do**
- or
- b. **Not do something they are supposed to do**

Often a bribe is given in order to gain an undeserved commercial benefit, e.g. bribing a public official to be able to sell to a government customer. Whether a bribe is given directly, or through an external middleman or the recipient's relative, is irrelevant.

Bribery includes planning, or approval, of such actions. It can include suspecting that bribery is occurring, but doing nothing about it, as well as trying to avoid knowledge of actual or potential bribery ("willful blindness"). Bribery is a crime that can result in large fines and/or lost business for Nilfisk, as well as serious damage to our reputation, and possible imprisonment for individuals. **Bribery has no justification: bribing to obtain or maintain business hurts Nilfisk, rather than helping Nilfisk.** We shall not engage in bribery and are committed to working alone, and with external stakeholders, toward eliminating facilitation payments, which are small-value payments (below 100 EUR) made to low-level public officials in order to:

- a. **Ensure that they perform their official duties** and/or
- b. **Obtain a benefit we are legally entitled to receive**

"Public officials" are employees of any kind of government organization, state-owned company or political party, and political candidates.

Report violations

Members of the Nilfisk Board of Directors, and Nilfisk managers and employees, shall immediately report to the global compliance team, if:

- They suspect violations of the Anti-corruption Rule by employees, management, Board members, or any **associated persons***.
- They learn of requests to pay facilitation payments, or when such payments are made.
- Third parties inquire about anti-corruption activities, including customers' audit requests or government agencies.

Specific requirements

Employees and management working in specific areas, such as Strategic Sourcing, Finance, and Sales, shall comply with specific requirements in the Anti-corruption Rule, and with related guidelines applicable to their work, e.g.:

- Conduct due diligence on associated persons and acquisition targets.
- Perform corruption-risk assessments on e.g. operations, markets, and projects.
- Use standard Nilfisk legal-compliance clauses in agreements or use approved alternative text.
- Ensure sales to government customers are transparent and comply with applicable rules.
- Ensure charitable and political donations are transparent, with relevant approval from the Nilfisk Leadership Team (NLT).
- Require associated persons to adhere to similar behaviour standards in their dealings with Nilfisk.
- Monitor the behaviour of Nilfisk, and of **associated persons*** in their dealings with Nilfisk.

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DOs and DON'Ts

Members of the Nilfisk Board of Directors, and Nilfisk managers and employees, shall:

- Not engage in any aspect of bribery, including ignore **associated persons*** corrupt actions.
- Not offer facilitation payments, work to eliminate them, immediately contact the global compliance team if a payment is requested, and accurately record payments made.
- Require invoices, payment receipts, and other documentation, when paying government agencies.
- Ensure that travel, lodging, meals, entertainment, gifts, and other forms of hospitality which Nilfisk offers to third parties, are business-related and of moderate value, and involve only business-related persons.
- Never solicit hospitality or gifts from third parties, and only accept moderate business-related hospitality.

* Associated persons are parties acting on Nilfisk's behalf, e.g. certain service suppliers, agents or consultants, dealers or joint venture partners.



RULE #2

Competition & Anti-trust

Fair competition between companies is a major benefit to business, as well as to society in general. It makes companies more dynamic and efficient, promoting innovation and providing consumers and other customers with better value for money. Nilfisk wants to increase its market shares by supplying sustainable, high-quality products and services to customers at competitive prices through hard work and fair play against competitors on a level playing field.

Global competition laws target improper market practices, including improper cooperation between companies. Laws focus mainly on dealings between competitors, but also on other business relationships, e.g. suppliers and distributors. Nilfisk's worldwide operations can be impacted by the competition laws of many countries.

For example, as Nilfisk is a European Union (EU) based company, our global activities anywhere may trigger EU competition regulations.

Furthermore, the international scope of our US-based operations means US laws may impact our activities elsewhere.

Competition laws are complex, and determining what is permitted, or prohibited, involves many factors, e.g. identifying the product, service, and/or geographic markets involved; assessing the share of those markets held by Nilfisk and its partners, and; determining whether any legal exemption applies. Violating competition laws can be costly; breach of EU laws can trigger fines of up to 10% of a corporate group's total global turnover. They also risk losing the confidence of investors and key business partners, and becoming the focus of future investigations and audits, e.g. dawn raids where regulators arrive unannounced at a company to review files, contracts, computers, etc.,

in order to find possible violations.

Report violations

Nilfisk management and employees shall immediately report to the global compliance team when they suspect that violations of the Competition & Anti-trust Rule or any law are committed by:

- Nilfisk employees or management.
- Any external person or organization, including trade associations.

Specific requirements

Employees and managers dealing with competitors, suppliers, distributors, joint ventures, or asset-sales/acquisitions, shall comply with specific requirements in the Competition & Anti-trust Rule, and with related guidelines applicable to their work, e.g.:

- Follow guidance on the Nilfisk World Corporate Affairs website, about entering into agreements, and:
 - Following the Corporate Affairs Engagement Rule, and site guidance on Competition.
 - Using only approved contract templates or obtaining Corporate Affairs approval to use other contracts.
- They shall NOT agree to:
 - Fix resale prices of Nilfisk products/services.
 - Share information on customer, product, or geographic markets.
 - Restrict the output/supply of products.
 - Share Nilfisk business-related information with competitors.
 - Agree which competitor or dealer will win a tender
 - Prohibit distributors from supplying parties located in other territories who have asked to buy their products.

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DOs and DON'Ts

Nilfisk managers and employees shall:

- Read Nilfisk's Dawn Raid Manual available on the Corporate Affairs Nilfisk World website.
- Contact the global compliance team with their own and external parties' questions about competition law matters.
 - Discriminate among customers, or impose discriminatory prices, unless the global compliance team approves..
- Meetings with competitors may occur only for valid reasons, e.g.:
 - Formal trade-association meetings, contract negotiations, intellectual property disputes.
 - Agendas must be agreed upon in advance and followed, and must exclude discussions of prohibited activities listed above.
- If a discussion of any topics prohibited above begins at a meeting with competitors, employees shall:
 - Immediately try to stop the discussion.
 - Leave the meeting if the discussion continues, and have their departure recorded (and make a written note themselves).
 - Immediately report the matter to the global compliance team.

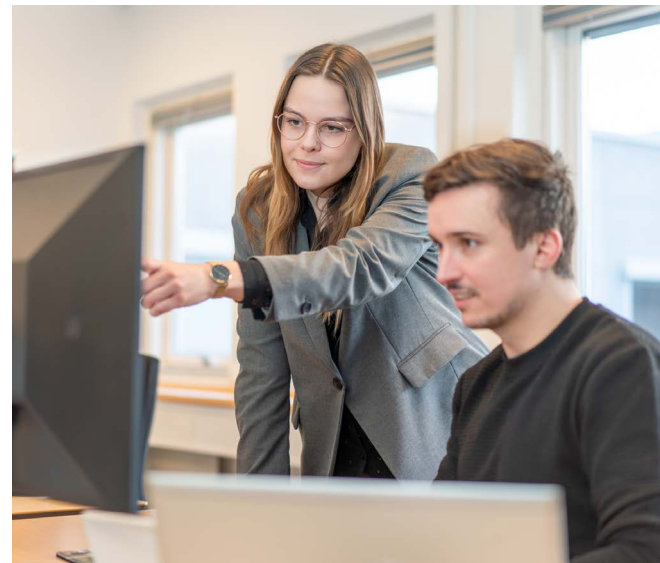


RULE #3

Data Privacy

In accordance with the European Union's (EU) General Data Protection Regulation (GDPR), and other applicable data-privacy laws, Nilfisk processes all personal data transparently and responsibly, focusing on relevance and accuracy, and only on appropriate legal bases, e.g.:

- Its legitimate interests as an employer, or as a business and/or contract partner.
- Its obligations under applicable laws, e.g. to tax authorities or public agencies responsible for advancing the interests of disadvantaged groups.
- Protecting its legal interests, i.e. in relation to potential/actual legal claims.



Personal data includes:

- Ordinary data, e.g. names, addresses, contact details, or job titles/ functions.
- Sensitive data, e.g. health matters, union membership, race, ethnicity, genetic, or biometric data.

Nilfisk is committed to processing all personal data in a secure manner – including during data-transfer processes – and sharing personal data only on a need-to-share basis. We treat personal data confidentially, striving to minimize data volume, e.g. through consolidation and deletion. Nilfisk processes sensitive data under heightened standards, i.e. only when there is a legal requirement or other compelling reason.

Nilfisk works hard to fulfil GDPR and other legal requirements, such as:

- Mapping relevant databases and the flow of personal data.
- Providing required notices on how we process personal data.
- Using relevant data-related agreements when required.
- Protecting the legal rights of individuals regarding their data.

Breach of data-privacy laws can result in very large fines of up to **4% of global turnover** and legal claims, as well as damage to the trust held by Nilfisk's investors, customers, employees, and other stakeholders.

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DOs and DON'Ts

All Nilfisk employees and managers shall:

- Only process personal data as required by their jobs (e.g. supporting business and operations).
- Treat personal data confidentially, sharing it on a need-to-know basis.
- Process personal data securely, including during cross-border data transfers.
- Store data only in accordance with Nilfisk instructions, including on personal electronic devices.
- Minimize, consolidate, isolate, and/or delete personal data whenever feasible.
- Store personal data only for permitted time periods.
- Ask their managers, or the global compliance team, if unsure about how to deal with any personal data.
- Use applicable standard Nilfisk data-protection provisions in agreements or use approved alternative text.
- Not discuss, or otherwise share, someone's sensitive data with colleagues or others, except as instructed.
- Not share the personal data of colleagues or business partners outside Nilfisk, e.g. on social media.
- Not store any Nilfisk-related data in databases, or on devices, which have not been approved by Nilfisk.



RULE #4

Foreign Trade Controls

(sanctions and export controls)

The Nilfisk Foreign Trade Controls Rule sets out the actions and behavior expected of Nilfisk employees in their work, and reflects what Nilfisk expects of distributors, joint venture partners, agents, and suppliers who:

- Supply goods to Nilfisk, including IT hardware and software.
- Facilitate the supply of Nilfisk products (e.g. logistics providers).
- Support Nilfisk's commercial dealings with external parties.

In certain cases, export controls require that dual-use products – commercial items and technology with a potential weapons or surveillance use – are licensed for cross-border transport, including between Nilfisk companies. This includes licenses to export dual-use items from the US or from the EU, as well as US licenses to ship certain US dual-use items between third countries (re-export licenses).

Government sanctions limit, or prohibit, commercial dealings with targeted parties, governments, or countries. US sanctions prohibit US persons (US citizens and permanent residents, US companies (e.g. banks), and anyone who is in the US at any time) from involvement in commercial dealings with certain parties and countries. An updated list of sanctioned countries is available on Nilfisk's Corporate Affairs' website.

Violations of foreign trade controls can result in large fines, prison for individuals, serious damage to our reputation – especially among US institutional investors – and lost business, especially that of US companies and the US government.

* Associated persons are parties acting on Nilfisk's behalf, e.g. certain service suppliers, agents or consultants, dealers or joint venture partners.

Specific requirements

Employees and managers working in specific areas, such as Logistics, Strategic Sourcing, Finance, and R&D, shall comply with specific requirements in the Foreign Trade Controls Rule and with related guidelines applicable to their work, such as:

- Screening business partners and acquisition targets against official sanctions lists.
- Perform foreign trade controls risk-assessment for e.g. new products, technology, and suppliers.
- Use standard Nilfisk legal-compliance clauses in agreements or approved alternative text.
- Obtain the global compliance team's approval for dealings with sanctioned countries or parties.
- Report suspicious facts to the compliance team (e.g. consignees/ customers who may intend to ship products to sanctioned parties or destinations).
- Maintain updated lists of:
 - Final products, components, and spares that are dual-use, and
 - Final products containing 10% US-made components OR 25% dual use components (% of product's market value comprised of such components).
- Contact the compliance team to obtain export/re-export licenses.
- Obtain information internally, and from suppliers, on dual-use and US-content status.
- Maintain required export-control documents for e.g. transport, dual-use classification, or country-of-origin certificates.
- Require relevant associated persons to comply with applicable foreign-trade controls, e.g. through our contracts with them.
- Monitor the behavior of Nilfisk and of **associated persons*** in their dealings with Nilfisk.

Responsibilities and reporting

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DOs and DON'Ts

Nilfisk managers and employees shall:

- Immediately report to the global compliance team if they suspect any violation of this Rule, or related guidelines, by anyone in Nilfisk or external parties; or when they are met with inquiries from any external party, e.g. banks, customers, governments, about foreign-trade control compliance.
- Comply with foreign-trade control requirements in agreements with banks, and with other business partners.





RULE #5

Anti-fraud & Conflicts of Interest

Fraud means deception or cheating carried out by someone seeking direct or indirect personal gain (e.g. inflating travel expenses in order to receive extra money from Nilfisk, or inflating sales volumes in order to reach KPI's or to gain a bonus).

Conflicts of interest occur when a Nilfisk employee uses close personal relationships, or private economic interests, to gain personal benefits at Nilfisk's expense. Conflicts of interest also include insider trading, which involves trading – or helping others to trade – Nilfisk shares after having gained access to confidential information concerning Nilfisk's activities.

Fraud and conflicts of interest can both cause significant losses for Nilfisk (e.g. an employee's theft of funds or assets, or Nilfisk's payment of inflated prices to suppliers). It can seriously harm Nilfisk's reputation, and damage the trust we have earned from investors, business partners, colleagues, and other stakeholders.

In some cases, Nilfisk can face legal claims from investors, or customers, who believe they have suffered a loss due to fraud or conflicts of interest. People committing these acts risk fines or prison sentences, in addition to losing their jobs.

Money laundering is fraud that occurs when money derived from crime is used in legitimate business dealings (e.g. purchasing legal products). It also occurs when legitimate money is used to support crime. To avoid these risks, Nilfisk employees dealing with suppliers, customers, or other business partners, should follow the Anti-fraud & conflicts of interest Rule's guidelines concerning money laundering.

Growing fraud risks include cyber-crime attempts i) phishing e-mails that look legitimate but request changes to bank details

for our suppliers, or urgent payment to a "supplier account", but actually include account numbers belonging to fraudsters – always contact the vendor independently to confirm names and details before authorizing payment; and (ii) "confidential" mails from senior managers asking the recipient to contact someone or transfer money to an unfamiliar bank account – always follow Nilfisk's standard procedures and authorization of payments.

Potential conflict of interest

All Nilfisk employees shall:

- Notify their immediate manager of:
 - Close relatives employed by Nilfisk or its business partners in ways that impact their daily work, e.g. the employee and their relative will deal with each other in performing their jobs.
 - Their or their close relatives' significant financial interests in a Nilfisk business partner.
- Not have business dealings with close relatives who work in or own more than 5% of a Nilfisk business partner, or with business partners in which the Nilfisk employee has a significant interest, without written approval from local management and HR.
- Not participate in the hiring, or performance-evaluation, of a Nilfisk job candidate or colleague who is a close relative.
- Not be a subordinate or manager of a close relative, without the approval of Group HR and the global compliance team.

Members of Nilfisk's Board of Directors shall also:

- Disclose to their fellow Board members significant financial interests in Nilfisk business partners, and identify any close relatives employed by Nilfisk, or by major business partners, in key positions.
- Recuse themselves from Board decisions that can generate personal financial gains.

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DOs and DON'Ts

Members of the Nilfisk Board of Directors, and Nilfisk managers and employees, shall:

- Seek reimbursement only for legitimate, accurately documented business-related expenses.
- Not seek to obtain money, assets, or any other benefits, which they are not entitled to receive from Nilfisk.
- Not seek to gain improper benefits for themselves, or for Nilfisk, from any person.
- Not trade, or help others trade, Nilfisk shares outside applicable "trading windows" if they are insiders.
- Provide complete, accurate responses to Nilfisk's questions concerning conflicts of interest.
- Follow Nilfisk's Authority Matrix governing commercial and bank transaction approval.
- Follow guidance on addressing internal/external fraud attempts.
- Immediately report to the global compliance team any suspected violation of this Rule by employees or managers.
- Cooperate with the global compliance team and Global Finance in audits and investigations.
- Provide only accurately documented costs and revenue in financial reporting.
- Not grant unauthorized discounts to anyone purchasing Nilfisk products/services.



RULE #6

Climate & Environment

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Nilfisk strives to align with the most up-to-date climate science in order to track our performance against our impactful targets to reduce greenhouse gas (GHG) emissions stemming from our business operations, value chain and products. At the same time, we work to develop and produce high quality products that deliver value to our customers and other stakeholders.

Nilfisk works to consider a product's entire lifecycle during the design phase. We work with the goal of increasing cleaning efficiency when developing new products, thereby minimizing products' resource consumption and reducing total cost of ownership.

Nilfisk is committed to reducing or preventing waste and pollution through continuous improvement of our Quality and Environmental Management System (QMS/ EMS). We control the use of hazardous chemicals in our products, and work to replace hazardous substances with safer alternatives, often exceeding applicable legal requirements.

Nilfisk acknowledges the importance of reducing our climate footprint and has implemented a science-based approach to achieve this.

Nilfisk has committed to decarbonize its business across scopes 1, 2 and 3 as they are verified by the Science Based Target initiative (SBTi).

Nilfisk complies with or exceeds applicable standards, as well as regulatory and legal requirements. We support and pursue fair, balanced, and practical regulations that effectively protect our climate and environment.

DOs and DON'Ts

Nilfisk Managers and employees shall:

- Support Nilfisk's efforts to protect the climate and environment, and shall, in their work, take practical steps to limit their impact on the climate and environment.
- When involved in the activities below, comply with this Rule and related guidelines as follows:
 - Comply with or exceed all requirements in our Quality and Environmental Management System (QMS/EMS).
 - Minimize pollution, and other negative environmental impact, by reducing/controlling discharges into water, soil, and air, including: air particles, ozone-depleting substances, gases, noise, vibration, odor, and light.
- Minimize the use of virgin materials (e.g. previously unused raw materials) through reduced use, reuse, and recycling, including:
 - Reducing materials used for packaging, products in process, and end products.
 - Maximizing the lifecycle of all products.
 - Using greater amounts of recycled materials in packaging and products.
 - Reusing materials instead of sending them to waste.
- Use and reuse water as efficiently as possible especially in water-scarce areas.
- Reduce the use of hazardous chemicals, by:
 - Blacklisting hazardous chemicals and finding superior alternatives for use in our products.
 - Optimizing processes for handling, storing, transporting, and disposing of chemicals.
- Comply with evolving legislation through replacement of hazardous chemicals, and, wherever feasible, Substances of Very High Concern (SVHCs), with more sustainable alternatives.
- Minimize the negative impact on our climate by, e.g.:
 - Reducing energy-consumption in, e.g. production, administration, transport, supply chain, and product use/ disposal.
 - Transitioning to renewable energy sources.
 - Reducing emission of greenhouse gases (GHG).
 - Promoting and supporting waste sorting for optimized recycling
- Integrate Climate & Environment Rule into Nilfisk strategies, projects, transactions, and operations and in setting objectives within the Quality and Environmental Management System (QMS/ EMS) framework.



RULE #7

Health & Safety

Nilfisk is committed to establishing a safe and healthy work environment, and to safeguarding health and safety in all workplace activities. We focus on strong Occupational Health and Safety (OHS) governance, including identifying OHS hazards and risks, providing OHS training and support that give employees the skills and equipment needed to perform their work safely, and setting proactive OHS targets.

At Nilfisk, the responsibility of Health and Safety are shared at all levels. We are all personally responsible for Health and Safety at the workplace to the extent required by our duties and to the best of our knowledge, ability and experience, while the Nilfisk Leadership Team (NLT) has overall responsibility.

We treat applicable health and safety legislation as a minimum standard. We are committed to complying with applicable laws and internationally recognized OHS standards, and with requirements in the Health & Safety Rule that exceed legal requirements.

Employee physical and mental well-being must be incorporated into Nilfisk's business strategies, plans, reviews, and product offerings. We implement, measure, and continually strive to improve our occupational health and safety processes for preventing work-related incidents, injuries and illnesses.

We are focused on employee health – both physical and mental – in all working environments. Further, in certain facilities, worker representatives participate in OHS (Occupational Health and Safety) decision-making, through workers' councils or by raising employee concerns during regular employer-employee meetings.

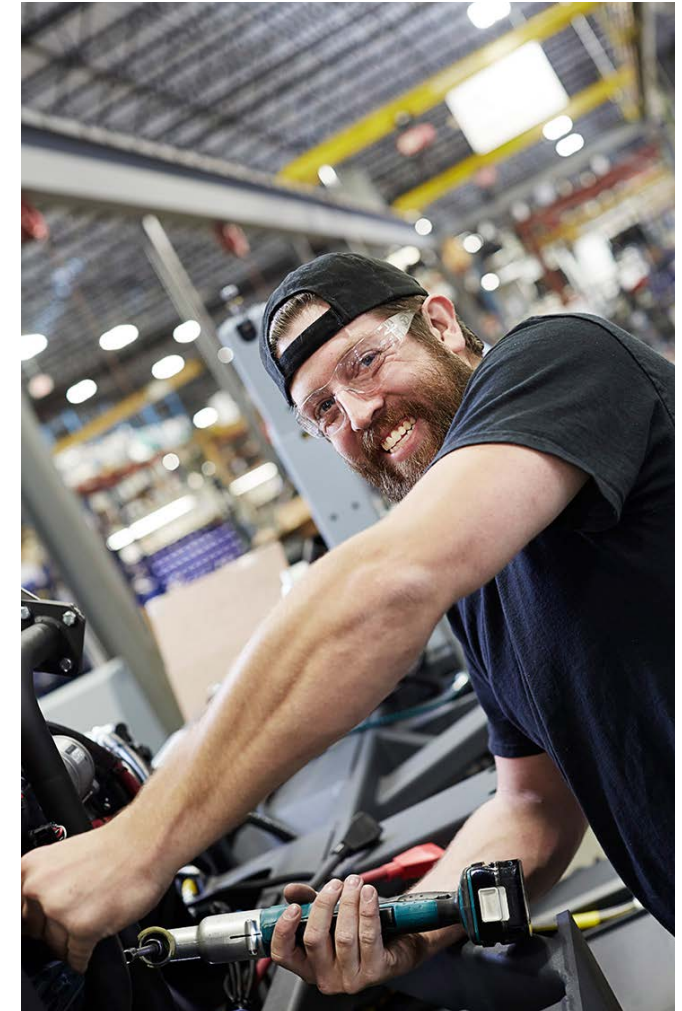
DOs and DON'Ts

Nilfisk employees shall:

- Report any incident or hazard to their immediate supervisor or manager.
- Supervisors or managers receiving safety incident reports shall investigate the case and mitigate the root causes to prevent similar future cases from happening.
- Obey reasonable instructions aimed at protecting employee Health and Safety.
- Use equipment provided for the protection of employee Health and Safety.
- Assist in identifying hazards/risks to Health and Safety, as well as aid in the implementation of risk-mitigation.
- Provide feedback to their supervisor or manager on any matters that may affect their Health and Safety.
- Not begin or continue activities that they believe may put anyone at risk of harm or injury
- Not endanger their own Health and Safety, or that of their colleagues, through the consumption of alcohol or illegal drugs.

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RULE #8

Labor Rights, Diversity & Inclusion

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Nilfisk seeks to create a dynamic, highly engaging workplace, in which employees can thrive while meeting challenges, gaining knowledge, and enjoying new experiences. We act to create a fair, healthy, safe, and engaging work environment for all employees. That also means a commitment to respecting human rights and labor rights throughout our operations.

Nilfisk sets high expectations for both its employees and the company, to ensure that employees feel empowered, respected, and highly valued.

We strive to build a workplace where commitment, creativity, independent thinking, and personal initiative thrive. Our goal is to provide a safe, healthy workplace, where employees may freely exercise their rights to, or not, engage in collective bargaining and/or join labor unions.

Nilfisk prohibits all forms of forced labor, (e.g. as defined in the UK Modern Slavery Act), as well as child labor not complying with global standards (e.g. those defined by the United Nations (UN)). Nilfisk ensures fair work hours, wages, and benefits, as well as fair free time.

Nilfisk becomes stronger and more dynamic by having a workforce that reflects the vast diversity of cultures and backgrounds in the global marketplace where Nilfisk operates. Nilfisk is committed to treating employees as individuals and providing them with equal opportunities based solely on individual merit.

Nilfisk encourages employees to identify areas where we should improve as a company and employer, and to propose improvements, expressing themselves professionally and courteously; if there are specific communication channels for certain topics, employees should use them. Likewise, we encourage employees to discuss topics of personal interest in a courteous way that respects their colleagues, within the framework of local laws.

Failure to comply with applicable laws may lead to significant fines, while failure to comply with high global standards risks not only serious reputational damage, but more importantly, loss of employees' trust.

DOs and DON'Ts

Employees, especially managers, shall support Nilfisk to:

- Require employees to act with integrity – honesty, fairness, accountability – in dealing with others, e.g.:
 - Treating colleagues, and others, with respect, and acknowledging their own mistakes.
- Deal with employees, business partners and job candidates fairly, and ensure equal opportunity based solely on merit.
- Prohibit discriminatory behavior toward individuals based on irrelevant factors (e.g. race, ethnicity, religion (or lack thereof), gender, sexual identity or orientation, age, disability, trade union membership or caste).
- Promote employee diversity, and inclusion reflecting that diversity, in Nilfisk's global workplace, while:
 - Striving to ensure that all levels of management reflect such diversity.
 - Identifying practical ways to ensure that historically-disadvantaged groups are represented.
- Ensure safe, healthy workplaces that comply with applicable laws and/or Nilfisk standards.
- Prohibit sexual and other forms of harassment against anyone, anywhere, at any level of employment, including criticizing work performance through vulgar, threatening or otherwise unprofessional language.
- Ensure employees, and their concerns, are treated with respect, fairness, and professionalism.
- Ensure employees know that they may raise concerns, whether internally or via Nilfisk's Whistleblower system.
- Ensure employees may freely engage in collective bargaining and/or join labor unions, and that:
 - They may freely reject collective bargaining or union membership.
 - Nilfisk may freely offer employees alternatives to collective bargaining or union membership.
- Prohibit any form of forced labor and ensure that persons under the age of 18 work only under global standards, and prohibit employment of anyone under age 16.
- Seek to integrate the foregoing goals and actions throughout Nilfisk's value chain.



RULE #9

Product Certification

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In the event of any injury, or any inquiry made by market-surveillance authorities, Nilfisk must demonstrate that our products are compliant at the point of sale. Third-party certification provides independent verification of this and is mandatory in some markets.

Failure to comply with the Product Certification Rule and/or related Standard Operating Procedures (SOPs) may lead to injury and/or damage, which may trigger large fines and significant harm to Nilfisk's reputation as a reliable manufacturer.

Specific requirements

- Third-party certification is mandatory for Safety, EMC, and Radio requirements.¹
- Third-party certification is mandatory for other regulatory areas where in-house or supplier capabilities are not in place, and Nilfisk, as a result, cannot obtain technical documentation needed to demonstrate compliance.
- Sale of a product may not begin until all applicable certifications and technical documentations are in place.
- Deviations from the aforementioned requirements must be approved by relevant Head of Competence Centre.

Because multiple certification schemes are applied on a global scale, applicable certifications shall be performed to cover identified relevant markets. The following global third-party certifications are designated:

- **EU-market access:** Certifications applying to European Standards (EN).
- **North-American market access:** Certifications applying to applicable US & Canadian standards. Multiple certification schemes are available for this purpose.
- **Certification Body (CB) Scheme:** Applying to International

Standards (IEC) gaining market access to additional countries.² In contrast, local certifications apply in markets outside the EU, US, and Canada, that do not accept basic certification:

- In most cases, CB Certification forms the basis for local certification, but local testing may be required in some countries.
 1. Safety covers the EU Machinery Directive and Low Voltage Directive, and similar US and Canadian legislation. EMC and Radio refers to EU Electromagnetic Compatibility and Radio Equipment Directives and similar US and Canadian legislations.
 2. CB Certification is a multilateral agreement among participating countries and certification organizations, which aims to facilitate trade by promoting harmonization of national standards with International Standards.



ECOFLEX™

Deep cleaning
Maximized cleaning effort for all kinds of high-traffic or heavily soiled areas from vinyl to concrete floors.

Flexibility
With one touch of a button the operator may at will vary the performance of the machine to suit any degree of soiled.

60 seconds burst
60 seconds burst of power Temporarily increased detergent strength, solution flow and brush pressure for a one-minute extra deep scrubbing. Perfect for difficult patches and surfaces.

Low-flow detergent
Eco Dosage System precisely matches detergent intensity to the level of dirt on the floor.

No pre-mixing
Detergent and water are mixed at brush deck. No more solution pre-mixing and no more water and detergent waste. And no solution tank to empty or clean.

Green cleaning
Default eco-cleaning mode with low-flow water and regular brush pressure is ideal for green, detergent-free routine cleaning.

Low-flow water
Intelligent Eco Solution mode reduces water consumption by as much as 70 percent.



RULE #10 Quality

Nilfisk is committed to consistently delivering sustainable and high-quality products and services that meet or exceed the expectations of our customers and other stakeholders, while also complying with applicable regulatory requirements as described elsewhere in this Code of Conduct.

The Quality Rule outlines the actions Nilfisk expects of management, and employees, in the design, development, performance, standardization, and improvement of processes that meet or exceed the product, delivery and service quality expectations of customers and other stakeholders. It also reflects the behavior expected of other parties providing services to, or on behalf of, Nilfisk. It is supplemented by guidelines and SOPs within Nilfisk's Quality and Environmental Management System (QMS/ EMS), which apply to all Nilfisk companies.

Our key areas of focus are:

- Fostering a customer-oriented and quality-focused mindset in all employees, to enhance customer satisfaction
- Capturing voice of the customer and embedding it in the development of products and services
- Empowering employees and strengthening capabilities to enable continuous improvement in product, delivery and service quality
- Investing in innovative technologies to increase process efficiency, effectiveness and learning
- Optimizing, standardizing, and globalizing our business processes to reduce complexity and enable a more consistent customer experience.
- Continuously improving the Quality and Environmental Management System (QMS/EMS).



Responsibilities and reporting

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DOs and DON'Ts

Nilfisk managers and employees:

- Shall support the application of standardized processes and process-control activities.
- If these are not available in a manager's field of application, they should aim to design, and establish, standards that are communicated/used to train new employees.
- Whose work involves activities related to supply, development, design, manufacturing, and delivery of products, or services, to customers or other relevant interested parties, shall comply with the Quality Rule and related guidelines or SOPs as follows:
 - Comply with all requirements of QMS/EMS.
 - Increase understanding, and satisfaction, of the next customer in the supply chain.
 - Establish performance-monitoring processes in order to drive transparency, focus, and improvement.
 - Aim to do things right the first time.
- Shall use the Quality Rule when setting objectives within the framework of the Quality and Environmental Management System (QMS/ EMS).

**RULE #11**

Information Security

Nilfisk works to continuously enhance our global Information Security programs applicable to all Nilfisk entities. Because information is a valuable company asset, integrating information security into our daily global operations is a top priority for everyone at Nilfisk.

At Nilfisk we encourage knowledge sharing and transparency; likewise, protecting non-public information about Nilfisk and its business partners helps us to maintain our competitive advantage and stakeholders' trust.

The following mandatory guidance explains how to identify confidential information and information that can be freely shared, and how to identify, mark and treat this information.

Employees shall keep confidential information safe by:

i) not sharing it with colleagues who are not designated as recipients or with family and friends

or

ii) disclosing it in public spaces, e.g. public transport or social media. If you are working in a public space on a public network, your communication is easily intercepted. Please consider this when working in a public area, e.g. be aware of your surroundings, sit where your screen cannot be seen, use VPN when connecting to public WiFi or use the personal hotspot on your mobile phone.

Nilfisk information includes any information involving Nilfisk and/or the external parties with which it deals, including information about companies and individuals.

Examples of confidential Nilfisk information:

- Electronic device security information (e.g. username/password).
- Information about specific sales/purchases, e.g. prices, and agreements.
- Information about new products or planned or current projects that are not yet public.
- Personal data about colleagues, except when shared with business partners dealing with them, and sensitive data about them as described in the Data Privacy Rule.
- Intellectual property information (e.g. patents, trademarks and copyright).
- Business strategies.

Safeguarding Nilfisk information extends beyond your core working hours and employment at Nilfisk. Confidential information must be treated as confidential until it's no longer non-public.

All Nilfisk information, in any form (e.g. documents and communications, electronic or otherwise), stored anywhere, remains Nilfisk's exclusive property.

We all share responsibility for the security of the information we use, share, and store, including our own data, colleagues' data, company data, and data belonging to Nilfisk's business partners. Failure to safeguard information securely can result in significant losses, including fines, damages owed to external parties, the loss of customer/investor confidence, and serious damage to Nilfisk's reputation.

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**DOs and DON'Ts**

Members of the Nilfisk Board of Directors, managers, and employees shall:

- Follow Nilfisk security directives, and other guidance, and protect the confidentiality, integrity, and availability of information, in order to ensure:
 - Information is not corrupted, hacked, lost, misused or stolen.
 - Information is only copied by, accessible to, or disclosed to authorized individuals.
 - Information is stored securely, in compliance with data guidelines (e.g. classification and retention periods referenced in the Data Privacy Rule).
 - Equipment and infrastructure are safeguarded in ways that limit the risk of theft, tampering, or destruction.
- Stay updated and follow information security initiatives.
- Integrate information security awareness into their daily work by paying special attention to cyber security, e.g.:
 - Never disclose confidential information.
 - Learn how to identify and always report cyber-attacks like phishing attempts or malware – see the Information Security page on Nilfisk World.
 - Have a strong, protected password and don't accept Multi Factor Authentication (MFA) requests you haven't initiated yourself.



Responsibilities and Reporting

 Anti-corruption	Nilfisk's Compliance Committee sets the strategic direction, and monitors the Anti-corruption, Competition, Data Privacy, Foreign Trade Controls, and Anti-fraud & Conflicts of Interest compliance programs, which are supervised by the Audit Committee.
 Competition and anti-trust	The global compliance team designs the programs, and drives their practical implementation globally with help from other relevant teams. In addition, the team and Global IT design the Data Privacy program, driving its practical implementation globally.
 Data privacy	The global compliance team works closely with Supply Chain, Strategic Sourcing, Treasury, R&D, and other teams, on compliance with the Foreign Trade Controls program. The global compliance team and Global Finance design the Anti-fraud & Conflicts of Interest programs, driving their practical implementation globally.
 Foreign trade controls	Nilfisk reports on the compliance programs annually, as part of its Sustainability report.
 Anti-fraud and conflicts of interest	
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 Climate and environment	The Nilfisk Leadership Team sets the strategic direction for, and monitors and reviews the rules on, Climate & Environment, Health & Safety, and Labor Rights, Inclusion & Diversity, as well as related Sustainability programs. Nilfisk's Board of Directors supervises those programs, and determines Board diversity targets, as set out under applicable legislation.
 Health and safety	Nilfisk report on the Health and safety rules in its annual Sustainability reporting, in accordance with applicable laws.
 Labor rights, inclusion and diversity	The Sustainability team works closely with Global Operations, HR teams, and other functional units, in designing the Sustainability programs and driving their global implementation.
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 Product certification	Nilfisk's R&D Managers and Directors are responsible for obtaining basic certifications. Each local Nilfisk sales company must determine whether local certification is required, and must obtain it whenever necessary. R&D Managers and Directors are responsible for ensuring that any changes, including changes to components, suppliers, or manufacturing, are captured, and considered in relation to certifications. Nilfisk's regulatory team is responsible for specifying, reviewing, and recording obtained certifications, along with technical compliance documentation, as well as issuing Declarations of Conformity.
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 Quality	The Nilfisk Leadership Team sets the strategic direction, and, along with the Quality Assurance team, monitors and regularly reviews the quality programs and key process performance within the QMS/EMS. Quality Assurance handles planning, updating and driving practical implementation globally. Every employee is responsible for following established procedures – and supporting improvements when needed.
<hr/>	
 Information Security	Nilfisk's Information Security Steering Committee sets the strategic direction and mandates the Information Security program, which is supervised by the Audit Committee. The Information Security & Compliance Manager designs the program, and drives its practical implementation globally.



Reporting concerns

The effectiveness of Nilfisk’s Code of Conduct depends on our knowledge of potential Code violations and taking necessary remedial actions. We depend on our employees, and people with a business or other relationship to Nilfisk, to report their concerns – if in doubt, please don’t hesitate to report.

You can report an incident you have experienced personally, or one that you have witnessed or learned about.

The most effective way to report is to contact a manager or HR partner, or to contact the global compliance team or other rule owner teams. Reports made internally must be escalated immediately to the global compliance team or relevant rule owner team.

In addition, anyone uncomfortable with raising a concern internally can use Nilfisk’s whistleblower system, which is operated by an external company. Such reports are forwarded to the head of Nilfisk’s global compliance team, as well as a small group of individuals. Our Whistleblower Policy supplementing this Code has more information.

Nilfisk does not permit retaliation against anyone who files a good-faith report. If you believe something is wrong, report it; you are acting in good faith, even if an investigation later concludes that no violation occurred. At the same time, there are consequences for intentionally filing false reports.

Nilfisk’s head of global compliance leads investigations of possible violations, involving others only on a need to know basis, and maintains confidentiality to the extent legally feasible. Investigations are confidential, thorough, fair and evidence-based, involving review of documents, files, communication, IT equipment and other information, and interviews, subject to applicable laws.

Consequences for violating this Code of Conduct

This Code of Conduct is part of the employment terms for every Nilfisk employee. As such, both the Code of Conduct and the guidelines supporting it must be followed.

Nilfisk will provide training to employees covering the Code of Conduct. Global compliance, Sustainability and other Rule owner teams, and your HR partners, are happy to answer your questions as well.

Everyone makes mistakes, and an honest mistake in violation of the Code of Conduct will not trigger penalties. The wording of the Rules may be misunderstood, leading to an honest but incorrect assumption that one is acting in compliance. It may also become apparent that Nilfisk’s training methods require adjustment or improvement.

However, if Nilfisk determines that someone has ignored the Code of Conduct, or deliberately violated it in the course of their work, that person will face penalties, such as a formal written warning or a lower performance-appraisal score. In the most serious cases, employees

will face immediate termination of employment.

If Nilfisk determines that a compliance failure involves the violation of a law or regulation, it may report details of the matter to, and/or cooperate with, relevant government agencies. Nilfisk will also cooperate with public authorities in official audits and investigations. In such cases, Nilfisk may find it necessary to disclose the identity, and activities, of all individuals involved in the matter.

If an individual violates laws or regulations, law-enforcement agencies can impose severe penalties, including fines and imprisonment. Some laws prohibit employers from paying fines on behalf of convicted individuals, and may impose other restrictions on support.

In the case of an enforcement action against an employee or any other individual, the scope of legal and other support Nilfisk provides, if any, will be based on Nilfisk’s evaluation of the facts surrounding each situation. In the most serious cases, this may mean that no support will be provided at all.

Whom do I contact?

If you have questions, comments, or concerns, speak with your immediate manager or HR Partner first. If something is still unclear, please contact the following teams:

The global compliance team at compliance.com@nilfisk.com OR jsimon@nilfisk.com, kmickel@nilfisk.com concerning the following Rules:

- Anti-corruption
- Competition
- Data Privacy
- Foreign-trade Controls
- Anti-fraud & Conflicts of Interest

The information security & risk management team at security@nilfisk.com, concerning the following Rule:

- Information Security

The Sustainability (CSR) Team at sustainability@nilfisk.com, concerning the following Rules:

- Climate & Environment
- Local EHS contact (Environmental Health and Safety, available for all manufacturing sites)

Your manager or local HR business partner

- Labor Rights

The Regulatory Team, Corporate Affairs at Regulatory.com@nilfisk.com for the Rule regarding

- Product Certification

The Quality Team at Quality@nilfisk.com for concerns regarding the

- Quality Rule



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