

# Code of Conduct

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The Skridr Code of Conduct is based on the principles of internationally recognised standards for responsible corporate management, such as the United Nations (UN) Global Compact, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the International Labour Organization (ILO) Core Labour Standards.

Thank you for joining us in championing responsible and ethical conduct. Skridr will be dedicated this to its work locally by membership certified Eco Lighthouse and member of Ethical Trade Norway.

## Ethical Principles

Ethical and fair conduct is of great importance to us, and we expect our business partners to agree to our principles, which are documented below.

The requirements involve the following aspects:

### INTEGRITY AND ANTI-CORRUPTION

Our business partners are expected to prohibit, not to practise and not to tolerate corruption, extortion, fraud, embezzlement and money laundering in any form. We expect our business partners not to offer (active corruption) or accept (passive corruption) any bribes or other unlawful payments. It is also expected that they shall not offer any gifts or other personal benefits to Skridr employees.

We expect our business partners to observe the applicable laws and ethical standards.

### FAIR COMPETITION

It is important to us that we deal with our customers and business partners in an open, fair and reliable manner. Skridr understands the importance of complying with antitrust and competition laws as these protect both performance-oriented companies such as Skridr and the common good, thereby enabling markets to develop freely.

We expect our business partners to act fairly in business dealings and to observe the applicable antitrust and competition laws.

### PROTECTION OF CONFIDENTIAL DATA AND INTELLECTUAL PROPERTY

Our business partners are obliged to treat data belonging to Skridr and its associated subsidiaries and affiliated companies responsibly and confidentially. Such data, including product details, pricing policies, costs, customer data, employee information and other information about the joint business relationship, working methods and organisation, must be protected against unauthorised access and dissemination and may, if at all, only be used and communicated with written agreement.

Personal data may only be collected by the business partner for legitimate business purposes and may only be used in legal, transparent and secure ways. Data may be transmitted exclusively to persons who are authorised to access them.

The business partner must protect the information in accordance with the security provisions, keep it only for as long as is necessary and place third parties who have access to personal data under an obligation to protect such data. We expect our business partners to observe the applicable data protection laws.

### REPORTING WRONGFUL CONDUCT

We expect our business partners to put in place reporting procedures for their employees that can be used to report any potentially wrongful conduct. All reports must be treated confidentially. Our

business partners should carry out investigations on the basis of any such reports and take any measures if necessary. We expect our business partners to inform Skridr in writing and without delay of any breach of this Code of Conduct if legal action, administrative investigations or criminal prosecution has been or could be taken. Please send any notifications to: [compliance@skridr.no](mailto:compliance@skridr.no)

## Human Rights and Working Conditions

We expect our business partners to observe human rights, to treat their employees fairly and with respect and also to request the same of all of your business partners (along the supply chain). This includes the following aspects in particular:

### AVOIDING CHILD LABOUR

We reject child labour in our supply chain. We expect the business partner to prohibit all forms of child labour in its companies. The definition of child labour complies with the ILO Core Labour Standards (Conventions 138 and 182).

### FREE CHOICE OF WORKPLACE

We do not tolerate slavery, servitude, forced labour - of any kind whatsoever - or human trafficking. Debt bondage or contractual bondage and involuntary prison labour are also not acceptable. We expect our business partners to ensure that this principle is not breached.

### DISCRIMINATION

The dignity of each individual must be fully respected. We expect our business partners to ensure that there is no discrimination on the ground of ethnic or social origin, gender, religion or belief, culture, disability, age, sexual identity or other personal characteristics, or on the grounds of political opinions.

### FAIR TREATMENT

We expect our business partners to treat their employees with dignity and respect. There should not be any sexual harassment, sexual abuse, physical punishment or torture, mental or physical violence, verbal abuse or the threat of such treatment.

### WORKING HOURS, WAGES AND OTHER BENEFITS

We expect our business partners to comply with applicable labour law provisions such as daily and weekly maximum working hours. Additional work and overtime must be undertaken on a voluntary basis and must be remunerated with at least the usual hourly wage in accordance with national law. The agreed wages and salaries must correspond to at least the statutory minimum wage or the minimum wage usually prescribed for the relevant industry sector and must comply with applicable laws.

The wage or salary paid should allow employees and their families to enjoy an adequate standard of living. Sanctions, fines, penalties and disciplinary measures may only be applied within the framework of applicable national and international rights and laws and in accordance with recognized human rights.

### FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Our business partners' employees must be granted the right to freedom of expression.

Employees' rights must be respected; it must be possible for employees to form associations and organisations that they deem appropriate in order to support and protect their interests. The employees must also have the right and the opportunity to join or leave such associations or organizations and to work for them as long as this does not affect the employees in carrying out their employment.

If ILO Conventions 87 og 98 er banned by national law we expect employers to facilitate and not hinder alternative mechanisms for free and independent organizing and negation.

#### SAFETY AT WORK AND HEALTH PROTECTION

A safe and healthy working environment is important to us. It should therefore be ensured that our business partners' employees are protected from any dangers, activities that are excessively physically demanding or that are harmful to health and any risks associated with the workplace. Applicable relevant safety guidelines from government provisions, laws and regulations for the respective activity or from contractual regulations must be observed.

We expect that everything will be done to prevent accidents, damage to health and illnesses that may arise in connection with the respective activity. As a minimum, employees must be guaranteed the availability of drinking water, adequate lighting, a comfortable room temperature, good ventilation and clean sanitary facilities. Employees must be informed and instructed / trained regularly about applicable health protection provisions, laws, etc. Written evidence must be produced about this and also any training and instruction given.

The medical treatment of work-related injuries and illnesses must be guaranteed. Ill or injured employees should be treated with respect. The business partner must identify risks to public health that may be caused by the business activity and take appropriate measures in order to exclude such risks.

### Sustainability

It should be ensured that sustainability and sustainable development form part of all business transactions carried out by our business partners and that they are firmly established as part of the everyday working life of all employees. We expect the highest commitment from all parties to make our world habitable for future generations.

#### ENVIRONMENTAL PROTECTION

We expect our business partners to comply with statutory environmental and environmental protection provisions at both a national and a local level. In addition, continuous efforts must be made towards the prevention and reduction of environmental impacts.

All waste management must comply with applicable policies, regulations and laws. In particular, the treatment of toxic and hazardous chemicals and materials and the disposal of such must be arranged in such a way that the environment is not damaged. Our business partners should use natural resources sparingly. Negative effects on the environment and the climate should be avoided as far as possible or reduced using appropriate procedures. Our business partners should commit to developing and using products and procedures that are more climate-friendly in order to reduce the use of energy and greenhouse gases.

We expect all partners EU partners to EMAS Certified and all other to be ISO14001 Compliant.

## SUSTAINABLE DEVELOPMENT

In the long term, business partners should strive for environmentally and socially responsible conduct throughout the supply chain and in the respective business activity.

## Implementation

Skridr expects its business partners to develop and expand a system in order to be able to implement, comply with, review and continuously improve the above points.

Our business partners are expected to develop, implement and use management systems such as DIN ISO 9001, 14001, 50001, 45001 and EMAS/Eco lighthouse and to carry out appropriate reviews in connection with this Code of Conduct.

Clear responsibilities, procedures and appropriate documentation should form part of this system / these systems. Annual reviews and the identification of measures for improvement must be documented and provided to us upon request. We reserve the right to check or to instruct authorised third parties to check that this Code of Conduct is being complied with. In the event of any deviations from this Code of Conduct or a failure to observe it, Skridr or one of its subsidiaries shall place the business partner under an obligation to take appropriate remedial action without delay. The Skridr Code of Conduct should be observed as part of the overall value-adding process; we therefore also expect our business partners to familiarise their own business partners who are appointed for or on behalf of Skridr with the requirements of this Code of Conduct and to ensure that these requirements are fulfilled.

## Skridrs commitments

Legal certainty, efficiency and transparency are important elements of a mutually beneficial business relationship. We take seriously our responsibility towards suppliers, customers, employees and the environment.

Information about business partners is treated confidentially.

We do not accept or offer unlawful gifts, payments, invitations, etc.

We treat differing opinions and views with respect and are open to other new ideas.

Everybody is treated with respect and dignity - irrespective of their position or their role. Agreed conditions and terms of payment are always observed.

Any indications of corrupt conduct, breaches regarding the handling of confidential data and data protection must be notified to Skridr in writing and without delay, as must any complaints or notifications of breaches of this Code of Conduct.

This shall not give rise to any prejudicial or disciplinary measures for the notifying person / company.  
Reports may also be given anonymously.

For this purpose, please contact:

Compliance officer: Lars Petter Lilleng

e: [lars.petter@skridr.no](mailto:lars.petter@skridr.no)

t: +47 6951 0492