

# *Business Partner*

# Code of Conduct

## Introduction

PRO:NORGE AS BELIEVES IN social and environmental responsibility and ethical conduct, and expects its business partners to do the same. PRO:NORGE AS is being developed with long-term sustainability in mind, which also includes building sustainable relationships with our business partners. Furthermore, PRO:NORGE AS and its business partners have an obligation to all stakeholders to observe high standards of integrity and fair dealing. This is the foundation for and the reason why PRO:NORGE AS has created the Business Partner Code of Conduct. Our policies and the Business Partner Code of Conduct are further based on:

- UN Universal Declaration of Human Rights and connected UN Conventions
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- OECD Guidelines for Multinational Enterprises
- UN Global Compact • ISO 14001

## Who does the Business Partner Code of Conduct apply to?

The Business Partner Code of Conduct applies to all our business partners that provide products or services to PRO:NORGE AS, or that are engaged or instructed to act for or on behalf of PRO:NORGE AS, such as e.g. suppliers (and sub-contractors if used while engaging with PRO:NORGE AS), consultants, distributors, agents and other representatives.

## Legal compliance

PRO:NORGE AS requires all our business partners to operate in accordance with the principles in the Business Partner Code of Conduct and in full compliance with all applicable laws and regulations. The Business Partner Code of Conduct does not replace legislation and if the two are in conflict, legislation takes precedence. If the Business Partner Code of Conduct sets a higher standard than the existing legislation, the reverse applies. The Business Partner Code of Conduct is valid in the English language. Where there are different language versions of this document, these shall be considered translations only. The form in Appendix II can be used in order to sign the Business Partner Code of Conduct.

## Raising concerns

Should you or your employees believe that the terms of the Business Partner Code of Conduct are not adhered to or that PRO:NORGE AS is not acting in accordance with its own PRO:NORGE AS Code of Conduct then we encourage you to raise your concerns to PRO:NORGE AS Head Office Code of Conduct function via the form provided in Appendix I.

## Implementation and monitoring

PRO:NORGE AS monitors the implementation and adherence of the Business Partner Code of Conduct. PRO:NORGE AS will assess its business partners' compliance with the Business Partner Code of Conduct. Violations will be handled immediately, and any violations of the Business Partner Code of Conduct may jeopardize the business partner's business relationship with PRO:NORGE AS, up to and including termination

# 1. Business Ethics

## 1.1 General

PRO:NORGE AS respects the laws and regulations in the countries in which it operates and requires that its business partners do the same. PRO:NORGE AS does not accept any corrupt activities, including but not limited to bribery, conflicts of interest, fraud, extortion, embezzlement and unlawful kickbacks, and its business partners shall not engage in, or cause PRO:NORGE AS to engage in, any form of corrupt activities.

## 1.2 Competition and antitrust laws

PRO:NORGE AS's business partners shall comply with applicable competition and antitrust laws and regulations. This means, among other things, to not engage in price fixing, market sharing, bid rigging or customer allocation.

## 1.3 Anti-bribery

PRO:NORGE AS does not accept bribes or facilitation payments in any form.

## 1.4 Conflict of interest

Conflict of interest between a business partner and PRO:NORGE AS must be avoided. Conflicts of interest may include outside business activities, personal financial interest, inside information, employment of, buying from, and selling to family members and close personal friends. Furthermore, PRO:NORGE AS expects you in your business interaction with PRO:NORGE AS to protect all confidential information provided by PRO:NORGE AS and respect the intellectual property of PRO:NORGE AS and others.

# 2. Human Rights & Labor Standards

## 2.1 Child labor

PRO:NORGE AS recognizes the rights of every child to be protected from economic exploitation and from doing work that is likely to be hazardous to their physical, mental or spiritual health, harmful to their moral or social development, or to interfere with their education.

A child in this context is a person younger than 15 years of age, or 14 years of age in accordance with the exceptions for developing countries as set out in Article 2.4 in the ILO Convention No. 138 on Minimum Age. If relevant national legislation has set a higher age, this age will apply.

Some countries apply the definition of "young workers" to persons above the minimum age and below 18, which means that there might be legal restrictions regarding the type of work that they are allowed to perform.

PRO:NORGE AS does not accept child labor, and expects the same from its business partners. However, PRO:NORGE AS acknowledges that it exists and realizes that it cannot be eradicated by simply setting up rules or inspections. If a child is found producing products or providing services for PRO:NORGE AS, it is requested that the employer acts in accordance with the overall best interest of the child. Business partners are expected to cooperate in seeking a satisfactory solution that will improve the individual child's overall situation, and the child's age, social situation and education shall always be taken into account before a decision is made.

## 2.2 Forced or bonded labor

PRO:NORGE AS does not employ or accept any form of forced or bonded labor, prisoners or illegal workers, and expects its business partners to do the same. PRO:NORGE AS acknowledges that means to force people to work can include a deposit of payment or demand to deposit identity documentation or other personal belongings, all of which is prohibited.

If business partners employs foreign workers on a contract basis, they must not be required to remain in employment against their will, and they shall further have the same rights as the local workers. The employer will pay for commissions and recruitment agency fees in connection with the employment where applicable.

All workers shall have the right to leave their workplace and accommodation (if provided) freely during the hours when they are not working.

## 2.3 Freedom of association and collective bargaining

PRO:NORGE AS expects its business partners to respect the rights of its employees to have the freedom to join, or not to join, an association of free choice as well as establish an association of free choice, to organize and to bargain collectively and individually in accordance with local laws and regulations. No employee should risk being harassed or retaliated against for exercising these rights.

## 2.4 Workers' contracts, working hours and compensation

PRO:NORGE AS expects its business partners to comply with local laws and regulations regarding workers' contracts, working hours, including overtime and overtime compensation. Salaries should be paid regularly and comply with the applicable local legislation and the local market situation. Workers should be entitled to a minimum of one day off in seven and to take time off for established national and local holidays. Workers should be granted the stipulated annual leave, sick leave and maternity/paternity leave without any negative repercussions.

## 2.5 Discrimination, harassment and diversity

PRO:NORGE AS values and promotes diversity and gender balance. PRO:NORGE AS expects its business partners to provide a work environment where everybody should be treated with respect and dignity and be given fair and equal opportunities for development.

PRO:NORGE AS does not tolerate any form of discrimination or harassment in the workplace, and our business partners shall not discriminate against any worker based on race, ethnicity, sexual orientation, gender, religion, age, disability, political opinion, nationality or any other potentially discriminatory factor.

#### **2.5 Alcohol and/or drug abuse**

PRO:NORGE AS works proactively to remove any workplace hazards. Individuals producing products or providing services for PRO:NORGE AS should not be on company premises or in the workplace if they are under the influence of, or adversely affected by, alcohol, to the extent this impairs the individual's ability to perform his or her work duties. PRO:NORGE AS has zero tolerance on drugs, and does not allow individuals producing products or providing services for PRO:NORGE AS to be on company premises or in the workplace if they are under the influence of drugs

## **3. Environment**

#### **3.1 Environment and sustainability**

PRO:NORGE AS shall meet legal environmental requirements and expects its business partners to obtain, keep current, and comply with all required environmental permits and licenses needed for their operations. PRO:NORGE AS encourages the development and diffusion of environmentally friendly technologies. PRO:NORGE AS recommends all business partners with significant environmental impact to implement certifiable environmental management systems or similar systems that facilitate the business partners' work with the environment.

#### **2.7 Consumer interest**

PRO:NORGE AS requires that applicable health and safety requirements are met for its products and services, and our business partners shall take this into account when producing goods or providing services for Briskeby Media.

#### **2.8 Responsible sourcing of minerals**

PRO:NORGE AS is committed to comply with relevant laws and regulations requiring disclosure of the use of conflict minerals. Conflict minerals are minerals from high risk and conflict-affected areas that have directly or indirectly contributed to financing of armed groups, where some groups are believed to be responsible for serious human rights violations. Goods provided to PRO:NORGE AS shall be in compliance with relevant laws and regulations regarding conflict minerals.

PRO:NORGE AS continuously seeks ways to reduce the consumption of resources. PRO:NORGE AS expects its business partners to strive to reduce its consumption of resources, including energy, waste and water, prevent pollution, have noise levels at acceptable levels and improve the overall environmental impact of its operations and products along the value chain. Further, chemicals and hazardous materials shall be labeled properly and safely stored, and recycled, reused and disposed of correctly.

## 3. Environment

### 4.1 Work environment

PRO:NORGE AS works systematically with health and safety and is committed to provide a safe work environment, and expects its business partners to do the same. Risks that can cause accidents or impair the health and well-being of individuals while working for PRO:NORGE AS shall be reduced. Therefore, occupational health and safety hazards shall be identified, evaluated and managed through a prioritized process of hazard elimination, engineering controls, and/or administrative controls.

For PRO:NORGE AS a safe work environment means, for example, that work areas are kept clean and free from pollution, machines used in production are safe and do not risk the health of the workers, and instructions regarding the use of personal protection and work equipment are adhered to. Personal protective equipment and work equipment shall be provided to the workers. Further, the work environment shall be well lit, and have temperature and noise at acceptable levels. When noise is above acceptable levels, personal protective equipment such as ear protection shall be used. All units should provide adequate and clean changing rooms, washrooms and toilets, separate for men and women. PRO:NORGE AS also expects the above from its business partners.

### 4.2 Building and fire safety

Hazardous material and equipment must be stored according to applicable law. There should be clearly marked emergency exits. Exits must not be blocked and should be well lit. All workers shall receive information about the safety arrangements such as emergency exits, fire extinguishers, first aid equipment, etc. An evacuation plan should be displayed on each floor of a building. The fire alarm should be tested and evacuation drills carried out on a regular basis.

### 4.3 First aid and medical care

First aid equipment must be available at appropriate locations, and at least one person in each location should be trained in basic first aid. The business partner should cover the costs of medical care for injuries incurred on its premises if they are not covered by social security or insurance, provided safety rules have not been violated.

# Appendix I: Report of non-compliance

I am aware of a situation that may not be in compliance with the PRO:NORGE AS Business Partner Code of Conduct.

Description of potential or actual conflict under the Business Partner Code of Conduct:

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Name and contact details:

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Please send this report to:

On behalf of PRO:NORGE AS

## Appendix II: Certification

PRO:NORGE AS requests the Authorized Signatory/Legal Representative of your company reads through the PRO:NORGE AS Business Partner Code of Conduct and by signing below and affixing company seal, if applicable, confirms you have understood, and will comply with the PRO:NORGE AS Business Partner Code of Conduct.

I, the undersigned, Authorized Signatory/Legal Representative of the company set out below, confirm that the company has understood and will comply with the PRO:NORGE AS Business Partner Code of Conduct.

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Place, date

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Company name

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Signature

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Name

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Title