

## Ethical Guidelines

### Ethical Guidelines for Senab Eikeland

The ethical guidelines for companies within Senab Eikeland aim to establish shared values across the organization. These guidelines ensure that owners, employees, customers, suppliers, public authorities, and other stakeholders can always trust the company's professionalism and integrity. Our guidelines are based on the requirements of the Norwegian Transparency Act, the OECD Guidelines for Multinational Enterprises, and the UN Principles for Sustainable Business. They provide a framework for how we take responsibility, protect human rights, and uphold high ethical standards in everything we do.

To ensure responsible business practices are maintained across all parts of the group, we have developed **Our Ethical Guidelines** (Code of Conduct). The purpose of these guidelines is to establish clear principles regarding human rights, labor standards, environmental management, and anti-corruption criteria that must be followed and respected by everyone working for or collaborating with Senab Eikeland.

### Our Ethical Guidelines for Suppliers (Supplier Code of Conduct)

To clarify our expectations for suppliers, we have developed a set of guidelines outlining fundamental requirements for human rights, labor rights, environmental protection, and anti-corruption within the supply chain. These guidelines are designed to ensure that all actors in the value chain operate in alignment with our ethical standards.

Senab Eikeland expects suppliers not only to comply with these guidelines themselves but also to communicate them to their subcontractors. Furthermore, we expect suppliers to take responsibility for ensuring that their subcontractors adhere to these requirements and actively support their compliance.

In our work with the Transparency Act, we utilize **Factlines** as a tool to assess risks and conduct due diligence within our supply chain, in accordance with our Routine 14.80 for Supplier Evaluation and Control.

## **Our Code of Conduct at Senab Eikeland**

### **REQUIREMENTS FOR OUR OWN OPERATIONS AT SENAB EIKELAND**

All employees must familiarize themselves with and adhere to the company's Code of Conduct. We expect our employees to act with integrity and accountability in all their actions. If any uncertainty arises regarding the interpretation of the guidelines, employees must consult their immediate supervisor before taking action. Breaches of the Code of Conduct may result in consequences for the employment relationship.

### **SOCIAL RESPONSIBILITY**

Our corporate group and suppliers must demonstrate active social responsibility both locally and regionally in the areas where we operate, by delivering services in a profitable, decent, and sustainable manner. Grounded in the company's core values - honesty, consideration, and integrity — these principles shape our corporate culture and guide our decisions and actions, contributing to positive societal development.

Our values — Proactive, Proud, and Proper — must influence both our internal operations and our relationships with suppliers. We are committed to ensuring that all business activities align with these values and support sustainable development. We emphasize social justice and equality and expect all employees to promote these values in their daily work.

### **SUSTAINABLE BUSINESS PRACTICES**

Senab Eikeland acknowledges that our operations may have adverse impacts on people, communities, and the environment. At the same time, we recognize our responsibility and ability to contribute to positive developments within the supply chain. Sustainable business practices are therefore fundamental to securing a sustainable future, meeting present needs without compromising the ability of future generations to meet theirs. We will continuously evaluate and improve our processes to reduce our climate impact and promote environmentally friendly solutions.

### **BUSINESS PRINCIPLES AND STANDARDS**

#### **Impartiality**

The board and employees must avoid situations that may create a conflict between the company's interests and personal interests. If personal interests may influence a decision or if an employee faces a situation that could compromise their impartiality, this must be promptly discussed with a superior.

## **External Positions**

Board memberships or ownership stakes in commercial companies must be cleared with group management. Employees must avoid secondary positions that could lead to conflicts of loyalty.

## **Trust, Respect, Loyalty**

The company's culture must be characterized by honesty, consideration, and integrity. Every employee is obligated to avoid personal interests interfering with objective decision-making in work-related tasks. Employees must be loyal to the company's mission and goals, follow through on decisions made, and comply with directives from superiors.

## **Anti-Corruption**

The company actively works against all forms of corruption, including extortion and bribery, in line with the UN Convention Against Corruption.

## **Gifts**

We maintain a zero-tolerance policy for offering, giving, accepting, soliciting, or receiving bribes or other undue advantages. Our aim is to ensure fair competition, avoid unethical business partners, safeguard privacy, and prevent all forms of fraud.

Employees must not seek to obtain or offer gifts, benefits, or other advantages that are inappropriate or could harm the company's interests or reputation. No benefits should be provided that could be perceived as improper or cast doubt on the recipient's integrity. During negotiations or specific contracts, employees must refrain from any form of gratuity. However, promotional items of symbolic value are not considered gifts.

## **Representation**

Moderate forms of hospitality and representation are part of the company's relationship-building and business/information development. However, the level of attention must not compromise the company's competitiveness or integrity. Travel and accommodation expenses for business trips are covered by the company, trade unions, public entities, or non-profit organizations.

Employees are expected to adhere to the Code of Conduct during business trips, courses, and other events.

## **PRIVACY, CONFIDENTIALITY, AND SECRECY**

Our company has procedures and routines to ensure compliance with GDPR requirements. Sensitive information must be treated with care and loyalty, even when not subject to confidentiality. All employees are bound by confidentiality regarding business secrets and information shared in confidence. Employees must exercise

caution in handling sensitive information, including with colleagues. The duty of confidentiality continues after employment with the company ends.

The ethical guidelines of our suppliers and customers must be respected and adhered to according to the established procedures when known to the company.

## **HEALTH AND SAFETY**

Our company has established a web-based HSE (Health, Safety, and Environment) system aligned with the requirements of the Working Environment Act and ISO 45001. All employees have access to this system via PC and mobile apps. Our goal is to conduct operations without harm to people, the environment, or material assets. HSE risks associated with the company's activities, products, and services must be identified and evaluated, with risk-reducing measures implemented.

We have procedures to ensure HSE training for managers and supervisors, as well as HSE competency for other employees in relation to their tasks. Relevant personnel must receive HSE instructions and information as per established procedures.

Senab Eikeland uses Backfeed for quality assurance and continuous improvement.

## **SOCIALLY RESPONSIBLE PRODUCTION**

Our company supports and respects the protection of internationally recognized human rights and ensures we do not contribute to their violation. Our guidelines for socially responsible production are based on international UN and ILO conventions, setting minimum standards for the company and our suppliers. Local production laws must be respected, with the highest standard applied where national laws and our guidelines overlap.

### **Prohibition of Child Labor**

- The minimum age for employment must comply with national laws, with an absolute minimum of 15 years. Exceptions for a minimum age of 14 may be accepted if permitted under ILO Convention 138.
- No children under 18 may perform hazardous work that could endanger their health and safety.
- Clear plans must be in place to phase out child labor that violates these conventions.

### **Prohibition of Forced Labor/Slave Labor**

*ILO Conventions No. 29 and 105*

- No form of forced labor, slavery, or involuntary work shall occur.
- Workers shall not be required to provide deposits or identity documents to their employer and must have the ability to terminate their employment with reasonable notice.

## **Prohibition of Discrimination**

*ILO Conventions No. 100 and 111 and the UN Convention on the Elimination of All Forms of Discrimination Against Women*

- Discrimination based on gender, race, religion, sexual orientation, or other protected characteristics is prohibited.
- Measures must be established to prevent sexually intrusive, threatening, offensive, or exploitative behavior and to protect against discrimination or dismissal on unreasonable grounds, such as marriage, pregnancy, parental status, or HIV status.

## **Right to Freedom of Association and Collective Bargaining**

*ILO Conventions No. 87 and 98*

- Workers must have the right to organize and negotiate collectively.
- Union representatives must not face discrimination for their activities.
- Where the right to organize and/or collective bargaining is restricted by law, employers must facilitate alternative mechanisms that ensure free and independent organization and negotiation.

## **Wages and Working Conditions**

*ILO Conventions No. 94 and 131*

- Wages must comply with national minimum wage laws or industry standards, whichever is higher. Wages must always be sufficient to cover basic needs, including some savings (ILO Convention No. 131).
- Working conditions must ensure that all workers receive wages in line with applicable wage levels and have the right to fair compensation (ILO Convention No. 94).
- Working conditions must comply with applicable labor laws in the production country, including statutory insurance and social welfare schemes.
- Wage deductions as a disciplinary measure are not allowed.
- Workers with the same experience and qualifications must receive equal pay for equal work.

## **Working Hours**

### *ILO Conventions No. 1 and 14*

- Working hours must comply with national laws or industry standards and shall not exceed the limits defined by applicable international conventions. The standard workweek should not exceed 48 hours.
- Workers must have at least one day off every seven days.
- Overtime must be limited and voluntary. The recommended maximum overtime is 12 hours per week, resulting in a total of 60 hours per week. Exceptions may be accepted if regulated by a collective agreement or national law.
- Workers must always receive overtime pay for hours worked beyond the standard workweek, in compliance with applicable laws.

## **Marginalized Populations**

### *UN Convention on Civil and Political Rights, Articles 1 and 2*

- Production and exploitation of natural resources must not threaten the livelihoods or sources of income of indigenous peoples or other vulnerable groups. This includes avoiding large-scale land acquisition and ensuring the responsible use of water and other essential natural resources on which these groups depend.

## **Human Trafficking**

- National and international laws against human trafficking must be strictly adhered to.

## **Conflict Minerals**

- Senab Eikeland shall gather information about suppliers' use of conflict minerals and implement necessary measures to avoid trading products that contain conflict minerals.

## **Corruption**

- All forms of bribery are unacceptable, including the use of alternative channels to secure illegitimate personal or professional benefits for customers, agents, contractors, suppliers, or their employees, as well as public officials.

## **Environment**

- Negative environmental impact must be minimized at all stages of the value chain. In line with the precautionary principle, measures must be taken to continuously reduce greenhouse gas emissions, local pollution, and the use of

harmful chemicals and pesticides. Sustainable use and management of natural resources such as water, oceans, forests, and land must be emphasized, while also preserving biodiversity.

## **Animal Welfare**

- Animals have intrinsic value, independent of their utility to humans. Animal welfare must be respected, and animals must be protected from unnecessary stress and harm. In the production of animal-based products, ethical considerations must be upheld throughout the value chain, and minimum national and international animal welfare laws must be followed.

## **Environmental Protection and Sustainability**

At Senab Eikeland, we are committed to integrating environmental protection and sustainability into all our processes. Our documented and certified environmental management system is based on, among other things, the UN Sustainable Development Goals, which guide our efforts towards a more sustainable future.

Our goals include:

- Decent Work and Economic Growth (Goal 8)
- Responsible Consumption and Production (Goal 12)
- Climate Action (Goal 13)
- Partnerships for the Goals (Goal 17)

We will continuously work to reduce our climate impact by focusing on elements such as energy efficiency, material efficiency, environmental product content, waste reduction, biodiversity, water resource management, and collaboration with others. The company will, where required, provide environmental training for all employees. Employees shall, where necessary, be aware of the environmental consequences of their actions and decisions. Environmental considerations and costs shall be included in our decision-making processes.

As part of our environmental responsibility, we will encourage the development and use of environmentally friendly technologies with our partners and suppliers. Furthermore, we will comply with national and international environmental legislation and regulations.

## **Whistleblowing**

- Whistleblowing must be conducted responsibly, in a manner that does not create harassment or undue stress in the working environment. This must follow the Norwegian Labor Inspection Authority's procedures for handling nonconformities. Those who report critical concerns shall not face retaliation, and their identity shall remain confidential.

Senab Eikeland has established an anonymous and secure whistleblowing channel for employees through the tool Winningtemp.

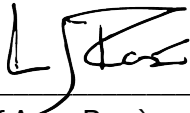
All stakeholders can report critical concerns via the whistleblowing form available on Senab Eikeland's website. All submissions will be treated confidentially and in accordance with applicable whistleblowing guidelines.

Link to the form:

[Whistleblowing Form](#)

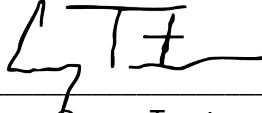


Revised and approved by the Board and Management of Senab Eikeland



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